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Ohio Auditor of State

Statewide Audit of Student Attendance Data and Accountability System

February 11, 2013

On the Cover: Engraved phrase from the
Thomas J. Moyer Ohio Judicial Center.



Dave Yost • Auditor of State

To the People of the State of Ohio:

In response to reports of irregular student attendance, enrollment and withdrawal practices within multiple school districts and a statewide concern over the integrity of the Ohio Department of Education's (ODE) accountability and reporting system, the Auditor of State's Office completed an audit in accordance with Ohio Revised Code Section 117.11. This audit includes an objective review and assessment of ODE's accountability policies, procedures and data, and local school district attendance, enrollment, withdrawal and reporting practices.

This final report includes an executive summary, project history, scope, objectives, methodology, and summary of the audit. It also provides the results of the assessments and corrective action recommendations.

This engagement is not a financial or performance audit, the objectives of which would be vastly different. Therefore, it is not within the scope of this work to conduct a comprehensive and detailed examination of local school report cards or Ohio's accountability system. Additionally, certain information included in this report was derived from ODE, Information Technology Center (ITC), and school district Student Information Systems (SIS), which may not be completely accurate. More than 260 AOS auditors were assigned to this engagement over the course of the audit and, as of February 4, 2013, the audit cost was \$443,099 and total audit hours were 10,807.

This report has been provided to the ODE and its results were discussed with the schools selected for testing. ODE is encouraged to use the results of this review as a resource in improving its accountability guidance and compliance monitoring.

Additional copies of this report can be requested by calling the Clerk of the Bureau's office at (614) 466-2310 or toll free at (800) 282-0370. In addition, this report can be accessed online through the Auditor of State of Ohio website at <http://www.ohioauditor.gov> by choosing the "Audit Search" option.

Sincerely,

A handwritten signature in blue ink that reads "Dave Yost". The signature is fluid and cursive, with the first name "Dave" and last name "Yost" clearly legible.

Dave Yost
Auditor of State

February 11, 2013

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1. EXECUTIVE SUMMARY

In response to requests from Columbus City Schools and the Ohio Department of Education to examine student attendance reporting practices, along with reports of actual or suspected inaccuracies in attendance reporting practices at several school districts in Ohio, the Auditor of State's office initiated a statewide review of attendance reporting in July 2012. This is the final report of this audit work.

The purpose of this review was threefold: (1) to identify systemic, and potentially duplicitous, student attendance and enrollment practices among Ohio schools; (2) to provide recommendations to the Ohio Department of Education (ODE) and Ohio General Assembly for making future policy and legislative improvements to Ohio's accountability system; and (3) to determine whether schools were scrubbing enrollment data.

Ordinarily, local report cards include only students enrolled for the "full academic year," or FAY. A student must be enrolled continuously at a single school from the end of October count week to May 10th for grades 3-8 or March 19th for all other grades to qualify for the full academic year of attendance. When a lawful break in enrollment occurs (e.g., a student relocates to a new district), school districts move the student's test scores to the State's report card; in such cases the scores no longer appear in the accountability data for the local district. Furthermore, if a student transfers between schools within the same school district, the student's test score is similarly moved or "rolled up" from the school report card to the school district's overall report card.

The Definition of Scrubbing:

This report defines scrubbing as removing students from enrollment without lawful reason, regardless of motivation. The term does not necessarily imply malicious intent.

Phase One: First Interim Report

The Auditor of State's office issued its first report October 4, 2012. The initial phase of the audit selected 100 schools from 47 school districts with the highest number of students that took assessment tests and whose test scores were subsequently rolled up to the State, thereby alleviating the district from accountability for performance of those students. Five school districts identified in the report were found to have improperly withdrawn students from their enrollment. They were Campbell City School District (Mahoning County), Cleveland Municipal City School District (Cuyahoga County), Columbus City School District (Franklin County), Marion City School District (Marion County), and Toledo City School District (Lucas County).

Phase Two: Second Interim Report

In November, 184 school districts in Ohio had levies or bond issues on the ballot. To alleviate to the extent practicable concerns about these districts, the Auditor of State's office selected 81 schools in 47 districts to test for questionable student attendance practices in the second phase of the statewide audit, issued October 23, 2012. The schools tested in the first phase of the audit were excluded from the second phase sample. Of the 81 schools tested in this phase:

- 53 schools were considered "clean" with no issues identified to date;
- 20 schools had records containing sporadic errors; and
- 8 schools still had testing ongoing and were considered "indeterminate" at the time of the report.

The Auditor of State's office also excluded an additional 26 districts from testing based on their low percentage of tested students rolled up to the State for the 2010-2011 school year.

Phase Three: Final Report

This report constitutes the third and final phase of the student attendance data and accountability audit.

Schools with Evidence of Scrubbing

The final report identifies four school districts in addition to the five school districts identified in the October 4 report that were found to have improperly withdrawn students from their enrollment. The additional districts are marked in **boldface** below.

The nine districts are Campbell City School District (Mahoning County), **Canton City School District** (Stark County), **Cincinnati City School District** (Hamilton County), Cleveland Municipal City School District (Cuyahoga County), Columbus City School District (Franklin County), Marion City School District (Marion County), **Northridge Local School District** (Montgomery County), Toledo City School District (Lucas County), and **Winton Woods City School District** (Hamilton County).

Schools with Errors

More than seventy (70) schools or districts were identified as having errors in attendance reporting. Auditors did not conclude that these errors were evidence of scrubbing.

The Auditor of State recommends that ODE review schools with evidence of scrubbing or with errors to determine whether any further assessment of the school report cards by ODE is necessary, and also to inform ODE judgments regarding the recommendations in this report.

Recommendations

Kids Count Every Day

The Auditor of State recommends basing State funding upon year-long attendance numbers, i.e., that money follow the student in approximate real time. Doing so would create an environment in which school districts that currently use attendance incentives for October count week—often with great success—would themselves have incentives to encourage attendance throughout a student’s entire year. Importantly, schools that break enrollment under such a system would suffer a loss of funding as a result.

Increase Oversight of School Districts

While ODE has relied heavily on an honor system for district reporting, the system should be reformed by introducing independent oversight. Both ODE and districts would benefit from expanded cross-checks and data monitoring throughout the school year. This would greatly enhance ODE’s ability to identify and correct mistakes or detect fraud in data reporting, particularly the Education Management Information System (EMIS). EMIS monitoring functions should be performed by an independent agency or commission appointed by the General Assembly.

While ODE has relied heavily on an honor system for district reporting, the system should be reformed by introducing independent oversight.

If it is not feasible to conduct such monitoring efforts throughout the school year, then monitoring should be conducted in close proximity to the close of the academic school year. ODE and the General Assembly should consider enacting penalties and taking corrective measures, such as temporary suspension of State Foundation funding or federal funding for noncompliant schools, until significant inaccuracies are fully corrected by noncompliant schools.

The widespread nature of data irregularities and questionable attendance practices demonstrates, at the very least, a lack of oversight by ODE over attendance reporting. To the extent that existing statutes contribute to an environment that makes ODE's role unclear, or cumbersome, those statutes should be amended to reflect the need for a robust, State-level accountability function within the Ohio tradition of local school control. Such changes may require additional resources or re-tasking existing resources to accomplish.

Monitor Programs for At-Risk Students

ODE assigns unique internal retrieval numbers (IRNs) to all schools, districts and certain special academic programs. AOS recommends ODE regularly monitor assigned IRNs to ensure schools are still using their approved IRN's for the originally-intended purpose. Additionally, AOS recommends the General Assembly provide express authority to ODE or another appropriate agency to monitor and independently verify at-risk student transfers to alternative school programs to ensure such transfers are made for valid legal reasons and the respective student performance ratings are reflected in the appropriate school or State's report card. This will provide greater consistency in the accountability data among schools for students receiving interventions in lieu of expulsion or suspension.

Increase EMIS Training

The General Assembly should develop minimum continuing professional education requirements for school personnel who use EMIS. Currently, federal and State laws do not do so. Especially when one considers that Federal and State accountability rules and regulations are further complicated by the Ohio school funding model¹ (which is separate and distinct from Federal and State accountability provisions), it is little wonder that education stakeholders have observed inconsistencies in report card data or instituted policies and practices that, in some cases, may cause errors in accountability. Providing baseline and continuing education to school EMIS personnel is critical to shoring up and ensuring the integrity of Ohio's accountability system.

Increase Use of Automation to Protect Data and Process Integrity

AOS recommends the General Assembly consider enacting legislation and providing the necessary funding to implement an automated student performance assessment-based testing system. This would allow more prompt reporting of test results, enabling information about progress toward college and career readiness to be included on report cards on a more timely and consistent basis. It also would significantly reduce risk of error or omission. As part of this initiative, the General Assembly should consider a needs-assessment study to appropriately finance this system and ensure a reasonable implementation period that considers the needs of all users. This may require certain steps to be phased in over time. AOS further recommends the General Assembly require test administration by independent proctors and that vendors submit student assessment scores directly to ODE throughout the year to be used for the calculation of adequate yearly progress (AYP) and the local report card.

State Monitoring of Student Withdrawals

To improve monitoring efforts, ODE should generate statewide school reports by student name and SSID number for key enrollment and withdraw codes. ODE should utilize these

¹ Governor Kasich announced his plan, "Achievement Everywhere: Common Sense for Ohio's Classrooms," on January 31, 2013. This proposed plan is a part of the 2014-2015 biennial state budget and could impact the State's school funding model.

reports to perform analyses and cross-check the timing of student withdrawals and subsequent enrollments against EMIS data reported by individual schools for completeness and accuracy.

Statewide Student Identifier System

The General Assembly should change existing law to allow the ODE to have access to names of students and other personal information with necessary privacy protections consistent with Federal law. This statutory constraint imposes significant costs on both ODE and on users of the Statewide Student Identifier (SSID) system without providing additional privacy protections beyond those required by Federal law. Only two states have been identified that operate under such restriction. This recommendation was given in an interim report of the performance audit of ODE issued October 8, 2012. The finding and recommendation was further supported during the review of attendance data. This system was an impediment to our auditors and should be removed to allow ODE to have access to student names and necessary information, with privacy protections.

Establish Separate Tracking for Community School Withdrawals

AOS recommends ODE create a separate and distinct withdraw code in EMIS for community schools, because of unique requirements for community school funding and monitoring.

ODE should remove the report card performance rating information from the SDC. This will reduce schools' ability to change the outcome of their local report card.

Protect Report Card Results from Security Vulnerabilities

ODE should remove the report card performance rating information from the Secure Data Center (SDC), allowing school districts only to verify EMIS data submissions with no access to projected rankings. This will reduce schools' ability to change the outcome of their local report card. While the concept of the SDC was to correct or verify EMIS information, allowing school districts to realize the projected report card ratings prior to the finalization of EMIS data gives the school districts the opportunity to intentionally "scrub" or change EMIS report card data to improve the outcome of the districts' final report card ratings.

Centralize Accountability Resources

ODE should provide a centralized index that helps connect accountability resources maintained in various locations on its website for school districts to use in reporting student attendance, enrollment, and other important report card factors. ODE should develop a centralized location on its website to provide clear instruction on accountability requirements and how they relate to EMIS reporting.

Statewide Student Information System

The General Assembly should establish a single statewide student information system so that all data is uniform, consistently reported, and accessible for data mining. Alternatively if such is not feasible the General Assembly should require ODE to approve the Student Information System used by each district in the State to ensure it meets requirements.

Document Student Withdrawals

ODE should clarify its EMIS Manual and administrative rules to require (and not merely suggest) what types of evidentiary documentation must be maintained for each of the EMIS withdraw codes.

Withdrawal of Foreign Exchange Students

ODE should revise its *Accountability Workbook* and *Where Kids Count Business Rules* to provide clarity on enrollment issues pertaining to foreign exchange students. During testing of student attendance and accountability records, AOS observed inconsistent treatment among schools of foreign exchange students. Due to the lack of ODE guidance in this matter, it is unclear whether a break in enrollment was appropriate in these circumstances.

Conclusion

This report includes findings from the AOS statewide assessment of school year 2010-11 student attendance and enrollment practices for select Ohio schools. AOS will refer the schools with evidence of scrubbing to ODE for further investigation and recalculation of the school report cards. AOS also will request that ODE consider reviewing the schools with errors identified in this report to determine whether the number or nature of errors AOS identified requires further assessment of the school report cards by ODE. Similarly, the schools with evidence of data scrubbing will be referred to the U.S. Department of Education Office of the Inspector General (IG) for review. It is anticipated that the IG will review these findings in the context of Federal law, and will consult with the United States Attorneys for the Northern and Southern Districts of Ohio.

AOS also updated its regular school district financial audit and single audit procedures to include testing for irregular attendance practices and potential scrubbing for fiscal year 2011-2012 and subsequent audit periods.

The Auditor of State's office extends its gratitude to the State Board of Education, the Ohio Department of Education, and the many school districts and organizations throughout the State that supported and cooperated with this audit.

In conducting this audit, the Auditor of State's office worked extensively with The John Glenn School of Public Affairs at The Ohio State University to develop statistical procedures and data management strategies in support of audit goals. The Auditor of State expresses his appreciation to The Ohio State University for its valuable contribution.

Most importantly, the Auditor of State's office extends its gratitude to the people of Ohio for supporting this work.

2. PROJECT HISTORY

The Elementary and Secondary Education Act (ESEA) was amended by the No Child Left Behind (NCLB) Act of 2001, which was signed into law on January 8, 2002. Under the NCLB model, a school's report card specifies its performance as compared to other schools in Ohio. Specifically, the NCLB school report card displays student achievement data in reading, mathematics, science and other core subjects required by the State so that parents and the public can see how their schools are progressing over time. In addition, the report card includes information on student attendance rates and graduation rates.

A school's performance on the report card can be affected by the students counted in the scoring. If the scores of low-performing students can be excluded from a particular school's report card, the overall performance of that school shows a corresponding improvement. This effect is described in a July 25, 2012, letter from the Ohio Department of Education (ODE) to the Lockland School District which found that attendance data had been "falsely reported" and ODE revised downward the school district's report card rating. A copy of this letter is provided in the Appendix of this report.

If the scores of low-performing students can be excluded from a particular school's report card, the overall performance of that school shows a corresponding improvement.

There are four components to Ohio's accountability system. They are State Indicators, Performance index Score, Value-Added, and Adequate Yearly Progress (AYP). The State Indicators are generally based on the number of State assessments given over all tested grades. To earn each indicator, a district or school needs to have a certain percentage of students reach proficient or above on a given assessment. Student test scores on the Ohio Achievement Assessment (OAA) and the Ohio Graduation Test (OGT) are State Indicators for the 2010-11 school year. The percentage of students per grade and test that were enrolled in the district for a "Full Academic Year" (FAY) are counted in the local report card. To have a day counted as an attendance day for meeting the FAY criterion, a student must be enrolled and in attendance during the year or be on expulsion status and receiving services from the school district (if the school district has adopted a policy as stated in paragraph (C) of Rule 3301-18-01 of the Ohio Administrative Code). Sometimes, however, allowable events occur that cause student scores to be removed from the local composite and included only in the statewide composite score.

Under No Child Left Behind (NCLB), there are several allowable ways student test scores can be excluded from an individual school's report card and rolled up to the school district wide or State report card as described in ODE's "Where Kids Count" (WKC) Methodology, a document available on ODE's website that explains ODE's business rules for counting students in the school, district-wide, and State-level report cards. Students do not always count at the school in which they are enrolled. For example, when a *district* makes the decision to educate a student in a location other than the resident school, the student will be counted in the resident school's results. An example is a school that educates all of the Limited English Proficient students in the district because of expertise or resources in one school – those students will count in their resident school's report card results. Conversely, when a parent, guardian, or the courts place a student in another educational setting, those students will count in the educating schools report cards results or, if in attendance for less than the FAY, those students will be rolled up to the State report card.

Our report focuses mainly on breaks in enrollment, which cause student test scores to be rolled up to the statewide composite report card. In this scenario, the local report card includes only students enrolled for the FAY. A student must be enrolled continuously at a single school from the end of October count week to May 10th for grades 3-8 or March 19th for all other grades to qualify for the full academic year of attendance. When a lawful break in

enrollment occurs, school districts roll the student's test scores to the State's report card. Furthermore, if a student transfers between schools within the same school district, the student's test score is rolled up to the school district's overall report card. Schools break enrollment by withdrawing or enrolling students between October count week and the end of the academic school year, which can occur routinely among some Ohio public school districts.

Amid the tough economic pressures and rigorous federal performance ranking requirements, some schools are incentivized to remove students with high absenteeism and lower test scores from their local report cards to boost performance measures used to determine government aid and improve school performance rankings. In fact, some schools also receive financial bonuses based on the schools' ranking.

3. OBJECTIVES AND SCOPE

On August 11, 2011, Dr. Gene Harris, Superintendent of the Columbus City School District (CSD) requested that the Auditor of State (AOS) review the district internal auditor's finding that there were absences deleted from the Columbus CSD school attendance records. Dr. Harris indicated the Columbus CSD's internal auditor was made aware of these changes from a truancy officer who was handling a court truancy filing. The truancy officer discovered the absences originally recorded in the student attendance records for the students in question were altered after charges had been filed. AOS met with district officials noting isolated attendance irregularities and requested Columbus CSD continue to investigate the attendance data internally and contact AOS if further discrepancies were noted.

Later, on June 15, 2012 the AOS was requested by Columbus CSD to meet with their internal auditor to discuss the results of an internal audit on student withdrawal activity after an article was published in the local newspaper, *The Dispatch*. A representative of the AOS met with the Internal Auditor at Columbus CSD soon thereafter. Additional allegations of irregular attendance and enrollment practices surfaced in Toledo and ODE uncovered similar practices in Lockland School District, leading to questions about the integrity of Ohio's accountability system statewide. As a result, AOS initiated a statewide systematic and objective assessment of school year 2010-11 student attendance and enrollment systems for more than 100 schools among 74 Ohio school districts.

The purpose of this review was threefold: (1) to identify systemic, and potentially duplicitous, student attendance and enrollment practices among Ohio schools; (2) to provide recommendations to the ODE and Ohio General Assembly for making future policy and legislative improvements to Ohio's accountability system; and (3) to determine whether schools were scrubbing enrollment data.

This engagement is not a financial or performance audit, the objectives of which would be vastly different.² Therefore, it is not within the scope of this work to conduct a comprehensive and detailed examination of local school report cards or Ohio's accountability system. Additionally, certain information included in this report was derived from ODE, ITC, and school district SIS, which may not be completely accurate.

² The AOS does not proclaim this work to be a performance audit in accordance with *Generally Accepted Government Auditing Standards (GAGAS)*. By definition, a performance audit refers to **an examination of a program, function, operation or the management systems and procedures of a governmental or non-profit entity to assess whether the entity is achieving economy, efficiency and effectiveness in the employment of available resources**. The examination is objective and systematic, generally using structured and professionally adopted methodologies; however, adherence to standards is not a requirement.

4. OVERVIEW OF ACCOUNTABILITY

Prior to the federal NCLB Act of 2001, Ohio's accountability system focused on districts, not individual schools. The Ohio General Assembly put the accountability system in place for Ohio schools and districts in 1997. ODE began issuing "official" report cards at the student, school, and district levels in February 2000 (for the 1998-99 school year). Parents of school-aged students received reports of their children's performance on proficiency tests, the average performance on proficiency tests at their children's schools (as well as other measures such as attendance and graduation rates), and the district performance (which included proficiency test results, attendance and graduation rates, and a number of other performance measures). ODE and public libraries also made these report cards and related data available to the general public on their websites.

Whereas publicizing data might have provided incentives for students, school, and districts to improve their performance, the accountability system at this time focused only on districts. Districts received various designations based on how many performance indicators they met. Originally, designations were based on 27 indicators (increased from 18 in 1997) that were given equal weight. The two non-cognitive indicators were based on requirements for a 93% attendance rate and a 90% graduation rate. The remainder of the indicators focused on the percent of proficient students according to State tests. The performance designations were calculated as follows:

- Effective (26 or more indicators met),
- Continuous Improvement (CI; 14 to 25 indicators met),
- Academic Watch (AW; 9 to 13 indicators met); and
- Academic Emergency (AE; 8 or fewer indicators met).

Out of more than 600 school districts in 2000, ODE deemed only 30 as effective and 200 as AW or AE. Districts labeled CI, AW, and AE were required by ODE to develop a three-year "Continuous Improvement Plan" (CIP). ODE regulated the contents of the CIP more heavily for AW and AE districts, including a requirement that ODE review those plans. Districts labeled as "CI" or below had to meet a "standard unit of improvement" every year. Thus, districts failing to meet the "effective" rating faced a long road of State administrative intervention. These sanctions began in the 2000-01 school year. School districts in AW and AE also received financial and technical assistance from ODE.

For the 2010-2011 school year, designations were based on 26 performance indicators with scores on assessment tests at 75% proficient or above. If the percentage of students scoring at or above the proficient level is greater than or equal to the State minimum standard then the district met the standard for that State indicator. If the percentage of students at or above the proficient level is below the State minimum standard then the district did NOT meet the standard for that State indicator. In sharp contrast to ODE's district designation rankings in 2000, for the 2010-11 school year, ODE deemed 215 school districts as Effective, 36 as CI and 6 as AW or AE. The approximately 352 remaining school districts were Excellent or Excellent with Distinction.

Adequate Yearly Progress

Adequate Yearly Progress (AYP) originated from the Federal No Child Left Behind (NCLB) Act of 2001. The legislation led Ohio to calculate school-level ratings beginning in the 2002-03 school year and to incorporate the NCLB's new AYP requirement in the accountability

system. The AYP metric itself changed the accountability system by 1) focusing attention on a particular set of indicators and 2) imposing significant sanctions if schools or districts failed to meet any AYP indicator for more than one year (with some caveats). The Ohio AYP indicators included meeting proficiency targets in math and reading for all of ten student subgroups, achieving attendance and graduation rates of 93% and 90% respectively, and meeting test participation rate requirements. The attendance rate requirement applied to elementary and middle schools and the graduation rate requirement applied to high schools.

The Federal NCLB requires Ohio to set AYP goals each year and raise the bar in gradual increments so that all of Ohio's students are proficient on State reading and mathematics assessments by the 2013-2014 school year. To this end, Title I, Sections 1116(a) and (b)(1), (7), and (8) of the Elementary and Secondary Education Act (ESEA) (20 USC 6316(a) and (b)(1), (7), and (8)) and 34 CFR Sections 200.30 through 200.34 require school districts annually review the progress of each school served under Title I, Part A to determine whether the school has made AYP. Every school and district must meet AYP goals that the ODE Accountability Model (approved by USD OE) has established for reading and mathematics proficiency and test participation, attendance rate and graduation rate. AYP determinations for districts and schools are based on test participation and proficiency rate goals. These goals are evaluated for the student groups when the minimum subgroup size has been met. AYP graduation and attendance goals are evaluated for the "All Students" group only. Failure to meet any of the proficiency or participation goals, attendance levels or graduation targets results in the district or school not meeting AYP.

Title I, Sections 1111(h)(2) and 1116(a)(1)(C) of ESEA (20 USC 6311(h)(2) and 6316(a)(1)(C)) and 34 CFR Sections 200.36 through 200.38 also require each school district that receives Title I, Part A funds prepare and disseminate to all schools in the district—and to all parents of students attending those schools—an annual district-wide report card that, among other things, includes the number, names, and percentage of schools identified for school improvement and how long the schools have been so identified.

Districts and schools that do not make AYP for two or more years in a row move into District Improvement or School Improvement status. Once they are in improvement status, districts and schools receive support and intervention and are subject to consequences. Districts and schools in improvement status must develop an improvement plan and keep parents informed of their efforts. Consequences escalate the longer a district or school is in improvement status, and range from using Title I funds to offer school choice, provide transportation to students electing to attend another school, and arrange for supplemental services, such as tutoring for students (Title I funded schools only), to restructuring of the school or district governance. Schools must identify for school improvement any school that fails to make AYP, as defined by ODE, for two or more consecutive school years. In identifying a school for improvement, ODE may base identification on whether the school did not make AYP because it did not meet (1) ODE's annual measurable objectives for the subject or (2) the same other academic indicator for two consecutive years.

The AYP calculations are applied separately to each school within a district and the district itself. The AYP determination for the district is not dependent on the AYP status of each of the schools (e.g. School A met AYP and School B met AYP so the district met AYP). Instead the calculations are applied again to district level data (e.g. School A had 20 out of 50 students who were proficient or above and School B had 35 out of 60 students who were proficient or above, so the District had 55 out of 110 students who were proficient or above). Therefore, it is possible for schools within a district to meet AYP while the district itself fails to meet AYP.

A school or district can miss AYP and earn “Excellent” or “Effective” designations for only two consecutive years. With the third year of missing AYP, the school or district designation drops to “Continuous Improvement” at which point the school district must take corrective measures including, but not limited to, restructuring.

Where Kids Count

Every school year, thousands of students change schools for a variety of reasons. While families living in poverty have the highest mobility rates, foster children and children in military families also move frequently. Mobility can negatively affect a student’s learning, achievement, social supports, physical and mental health. Since schools are graded based on student achievement, attendance and graduation, a key question for the accountability system is: which school do mobile students belong to for scoring purposes?

This question is actually a series of questions and is more complex than it might at first appear. The answers are governed by the Where Kids Count (WKC) rules. The Full Academic Year rule is a specific WKC rule that states how long a student must be enrolled in a school or district for their test score to count toward that entity.

Students who count toward a resident district or school designation under Ohio’s accountability system are those who:

- Met the full academic year criterion (i.e., the student was enrolled and funded during the October funding count week and continuously enrolled through the spring test administration).
- Attended a JVSD, ESC, or Postsecondary Institution and met the ‘Full Academic Year’ criteria at the district level.
- Enrolled in a special education cooperative program educated at another district and met the ‘Full Academic Year’ criteria at the educating district.

However, as described earlier in this report, students do not always count at the school in which they are enrolled. Students that are court- or parent-placed into an institution within the district or State school will not count at the school or district level. Students that only receive services from a district do not count in the accountability calculations for the reporting district or school. Examples of a student who only receives services would be one who participates in latchkey programs or a student that is not enrolled but receives career-technical evaluation services.

Flexibility Waiver

Ohio’s accountability system, which had previously focused on districts and a certain set of performance indicators, was modified so that Ohio could meet Federal accountability requirements due to NCLB. By the 2002-03 school year, ODE labeled both schools and districts as Excellent, Effective, Continuous Improvement, Academic Watch, or Academic Emergency based on a new set of indicators. Ohio has modified its accountability system since then, adding new performance indicators and changing the formula for assigning school performance designations. In recent years Ohio has complicated the system further with rewards and sanctions based on its own accountability designations, and the State received certain Federal exemptions related to AYP sanctions. Nevertheless, the NCLB’s AYP requirements arguably had the greatest influence on performance ratings and imposed the greatest potential administrative sanctions.

For the 2010-11 school year, Ohio was operating under a flexibility agreement with the U.S. Department of Education (USDOE) pursuant to Section 9401 of the Federal Elementary and Secondary Education Act (ESEA). This agreement permitted Ohio to include its differentiated accountability model as part of its system of interventions through the 2011-12 school year, unless reauthorization of the ESEA changes the requirements on which Ohio's model is based. As part of this flexibility agreement, Ohio had to agree to certain conditions detailed in the USDOE August 2008 Condition Letter. Despite this waiver, however, student attendance and enrollment remained an integral part of Ohio's accountability system and the local report cards.

Additionally, on September 23, 2011, USDOE offered each state the opportunity to request flexibility on behalf of itself, its local education agencies, and its schools regarding specific ESEA requirements, including certain Title I, Part A requirements, pursuant to authority in Section 9401 of the ESEA (20 USC 7861), which allows the Secretary of Education to waive, with certain exceptions, statutory and regulatory requirements of the ESEA. USDOE approved Ohio's ESEA Flexibility Waiver request in June 2012. The Ohio ESEA Flexibility Waiver has a conditional approval and took effect for the 2012 – 2013 school year. Ohio must submit an amended request with the final administrative rules for the A-F school grading system to USDOE by June 30, 2013 in order to continue to receive ESEA Flexibility. It is important to note, however, that if Congress reauthorizes ESEA between now and the 2014 – 2015 school year, the reauthorized law would take priority over Ohio's waiver.

2012-2013 ESEA Flexibility Waiver districts will have flexibility from sanctions and reporting requirements previously mandated in ESEA. In order to receive this flexibility, Ohio has agreed to adapt college-and-career-ready expectations, dedicate more resources to close sub-group achievement gaps and implement an evaluation system that will support effective instruction and leadership including, but not limited to:

- Implementation of rigorous standards, assessments and principal and teacher evaluations;
- Replacement of the Adequate Yearly Progress (AYP) measure, which had the unrealistic goal of 100 percent proficiency for reading and mathematics for every student in every demographic group. The new measures include rigorous, but realistic, objectives that aim to cut the achievement gap in reading and mathematics by half over six years, while requiring higher performance from all students;
- Changing the existing rating of schools to an A-F letter-grade system that will be easier to understand and give a realistic picture of school performance. The system and formula will officially begin with the report cards released in August 2013;
- Freeing schools from some reporting requirements and giving them greater flexibility in their use of Federal funds for professional development and other purposes.

The SSID System assigns a unique identifier to every student receiving services from Ohio's public schools, but Ohio law restricts ODE access to the student's personally identifiable information.

5. OVERVIEW OF STATEWIDE STUDENT IDENTIFIER

The Statewide Student Identifier (SSID) System is the cornerstone of ODE's student-level Education Management Information System (EMIS), a statewide data collection system for Ohio's primary and secondary education, including demographic, attendance, course information, financial data and test results. The SSID System assigns a unique identifier to every student receiving services from Ohio's public schools. This code will "follow" students as they move within and between Ohio districts, enabling studies of student progress and performance trends over time. The system has the following functions:

- Prevents the identification of actual student names, social security numbers, or other personal data that could breach individual confidentiality.
- Stores matching data and associated student identifier code throughout the course of each child's education.
- Facilitates assignment of individual SSIDs or mass assignment of SSIDs through batch processing or an online, web service.

Federal Family Educational Rights and Privacy Act (FERPA), 20 U.S.C. 1232(g), and Ohio Rev. Code §3301.0714 give guidance regarding proper and improper practice for records maintenance and transfer.

Ohio law restricts ODE access to certain personally identifiable student information. ORC §3301.0714 states, "the guidelines shall prohibit the reporting under this section of a student's name, address, and social security number to the state board of education or the department of education. The SSID System does not replace a district's student information system software, nor is it the entirety of the student level EMIS. It is a duplicative system designed to connect the district's student software system to ODE's student level EMIS database. Pursuant to the aforementioned Ohio law, ODE uses only the SSID, in lieu of personally identifiable student information, for EMIS reporting purposes to protect the privacy of student records. Only school districts can access the "crosswalk" that links personally identifiable student information to the SSID reported to ODE in EMIS. In addition to the complications noted herein, Ohio's system creates duplicative costs that have been reported in this office's separate, ongoing performance audit of ODE.

Per the Ohio Revised Code §3313.672, school districts are required to obtain reliable identification from parents upon enrollment in public schools. This can be obtained from birth certificates, passports, or immigration forms, for example. Ohio Revised Code §3301.0714(D)(2) further provides the following guidance:

"Each school district shall ensure that the data verification code is included in the student's records reported to any subsequent school district or community school in which the student enrolls and shall remove all references to the code in any records retained in the district or school that pertain to any student no longer enrolled. Any such subsequent district or school shall utilize the same identifier in its reporting of data under this section."

ODE provides verification reports to districts that will assist in determining whether two students have been assigned the same SSID. These reports will specify whether SSIDs are missing, invalid, or have potentially been used for multiple students.

The only reason to delete a SSID is if it is proven to be a duplicate SSID. If a student moves out of state, transfers to a private school, dies, withdraws or graduates, the SSID should not be deleted. Generally, a record deletion actually deactivates the SSID from the production SSID database so that it can no longer be used. ODE cautions school districts that unless the deletion is conducted as part of a system-wide duplicate clean-up process, school districts should confer with other reporting entities using different SSIDs for the same student prior to making the deletion. If a deletion is conducted in error, school districts may contact IBM for assistance in re-activating the record.

6. “BREAKING” ENROLLMENT

The school report card performance measures, and rewards and sanctions, associated with Ohio’s accountability system have changed over time. The incentives to create attendance breaks have generally increased over time as the consequences for poor performance became more severe.

As used throughout this report, the term “scrubbing” entails withdrawing students without proper documentation or justification. Such withdrawals are referred to as “attendance scrubbing” because they enable a school to remove or “scrub” a student’s poor attendance record. Another implication of withdrawing students is that their educational records do not count when calculating school performance for Ohio’s accountability system—that is, their educational records are rolled up to the state level for accountability purposes. Because student achievement and attendance are highly correlated, schools that withdraw students with frequent absences should benefit in terms of higher reported proficiency scores—whether or not students are withdrawn because of their low scores on State tests.

Strategies for predicting scrubbing could entail, for example, identifying schools that just attained a designation based on the performance index, the number of indicators met, the number of students in a particular subgroup, or the value-added score. Schools that might have the greatest incentive to scrub their data are those that stand to nearly miss a higher designation. Due to the complexity and evolution of Ohio’s accountability system, however, identifying schools that just missed a lower designation is perhaps an exceedingly time-intensive task with uncertain benefits. As described earlier in this report, the sheer complexity of the accountability system created incentives for all schools and districts to improve indicators such as attendance, proficiency, and graduation rates, as any positive change on these measures could prove pivotal in moving from one AYP designation to another.

The process of creating breaks in enrollment entails admitting or withdrawing students after the official October Average Daily Membership (ADM) count week. The following are valid reasons to create a “break” in enrollment pursuant to Chapter 2 of the 2011 ODE EMIS Manual:

Code	Reason
36	Withdrew from Preschool; Preschool student has withdrawn from the preschool program (for any reason)
37	Withdrew from Kindergarten; Kindergarten student has withdrawn because it has been deemed to be in the best interest of the student if he/she waits one more year until starting his/her kindergarten experience; may only be used by students in kindergarten.
40	Transferred to Another School District Outside of Ohio; Transcript request on file.
41	Transferred to Another Ohio School District; Local, Exempted Village, or City, transcript request on file.
42	Transferred to a Private School; Transcript request on file, i.e., Ed Choice students.
43	Transferred to Home Schooling; Superintendent’s approval on file.
45	Transferred by Court Order/Adjudication; If Court has designated a public district other than yours as district responsible for paying for the education. The resident district should not withdraw ANY students placed into the Department of Youth Services.
46	Transferred out of the United States

Because student achievement and attendance are highly correlated, schools that withdraw students with frequent absences should benefit in terms of higher reported proficiency scores.

Code	Reason
47	Withdrew Pursuant to Yoder vs. Wisconsin
48	Expelled
51	Verified Medical Reasons; Doctor's authorization on file.
52	Death
71	Withdraw Due to Truancy/Nonattendance
72	Pursued Employment/Work Permit; Superintendent Approval on file.
73	Over 18 Years of Age
74	Moved; Not known to be continuing.
75	Student Completed Course Requirements but did NOT pass the appropriate statewide assessments required for graduation. In the case of a student on an IEP who has been excused from the individual consequences of the statewide assessments, using this code indicates that the student completed course requirements but did not take the appropriate statewide assessments required for graduation.
99	Completed High School Graduation Requirements; Student completed course requirements and passed the appropriate statewide assessments required for high school graduation. In the case of a student on an IEP who has been excused from the individual consequences of the statewide assessments, using this code indicates that the student completed course requirements and took the appropriate statewide assessments required for high school graduation.

With regard to truancy, according to the Ohio Rev. Code, schools are permitted to withdraw students only after appropriate due process. The statutes provide several procedural steps which schools must follow in dealing with violations of the compulsory attendance laws. Ohio Rev. Code §3321.19 and §3321.20 require schools to give prior warning of the legal consequences of truancy to the parent or guardian of the truant child. When any child of compulsory school age is not attending school and is not properly excused from attendance, the school must notify the parent or guardian who must thereafter cause the child to attend the proper school (Ohio Rev. Code §3321.19).

Special provisions of the law apply to any student who is considered to be either a "habitually truant" or a "chronic truant". Ohio Rev. Code §2151.011 defines "habitual truant" as a school-age child who is absent from school without legitimate excuse for five or more consecutive days, seven or more days in a school month, or 12 or more school days in a school year. Ohio Rev. Code §3313.62 defines a "school month" as four school weeks. Ohio Rev. Code §2151.011 and §2152.02 define a "chronic truant" as a school-age child who is absent from school without legitimate excuse for seven or more consecutive days, ten or more days in a school month, or 15 or more days in a school year.

If a parent, guardian, or other custodian of a habitual truant fails to cause the child's attendance at school, the board of education may proceed with an intervention strategy in accordance with its adopted policy, may initiate delinquency proceedings, or both (Ohio Rev. Code §3321.19). Each board is required under Ohio Rev. Code §3321.191 to adopt a policy to guide employees in addressing and ameliorating the habitual truancy of students. If the board has established an alternative school, assignment to the alternative school must be included in the policy as an interventions strategy.

Ohio Rev. Code §3321.19 requires that upon the failure of the parent, guardian, or other person having care of the child to cause the child's attendance at school, if the child is considered a habitual truant, the board of education of the school district or the governing board of the educational service center shall do either or both of the following:

1. Take any appropriate action as an intervention strategy contained in the policy developed by the board pursuant to Section §3321.191 of the Revised Code;
2. File a complaint in the juvenile court of the county in which the child has a residence or legal settlement or in which the child is supposed to attend school jointly against the child and the parent, guardian, or other person having care of the child. A complaint filed in the juvenile court under this division shall allege that the child is an unruly child for being an habitual truant or is a delinquent child for being an habitual truant who previously has been adjudicated an unruly child for being an habitual truant and that the parent, guardian, or other person having care of the child has violated Section §3321.38 of the Revised Code.

Upon the failure of the parent, guardian, or other person having care of the child to cause the child's attendance at school, if the child is considered a chronic truant, the board of education of the school district or the governing board of the educational service center shall file a complaint in the juvenile court of the county in which the child has a residence or legal settlement or in which the child is supposed to attend school jointly against the child and the parent, guardian, or other person having care of the child. A complaint filed in the juvenile court under this division shall allege that the child is a delinquent child for being a chronic truant and that the parent, guardian, or other person having care of the child has violated Section §3321.38 of the Revised Code.

Attendance and student performance are highly correlated.³ Because student achievement and attendance are highly correlated, schools that withdraw students with frequent absences should benefit in terms of higher reported proficiency scores—whether or not students are withdrawn because of their low scores on State tests.

The performance measures and the rewards and sanctions associated with Ohio's accountability system have changed over time. As we describe above, the incentives to withdraw students with frequent absences or low test scores likely increased over time, as the consequences for poor performance became more severe. Moreover, the students whose attendance records schools and districts might have targeted also changed over time. For example, NCLB increased the stakes of school-level performance as well as the performance of student subgroups. Schools that had too few students belonging to a student subgroup (less than 30 students) were not held accountable for that subgroup's achievement for the purpose of AYP calculations. Thus, withdrawing just a few students from a low-achieving subgroup—just enough to drop the student count below 30—could allow a school to avoid serious administrative consequences. Because NCLB's AYP focused on reading and mathematics test results, schools and districts had especially strong incentives to withdraw students who scored poorly (or were expected to score poorly) on those tests.

It also is important to understand that the vast majority of schools and districts potentially stood to gain by improving their test and attendance outcomes, regardless of demographic

3 References:

Roby, Douglas E. Research on School Attendance and Student Achievement: A Study of Ohio Schools. Educational Research Quarterly available at <http://www.eric.ed.gov/PDFS/EJ714746.pdf>

Gottfried, Michael A. Evaluating the Relationship Between Student Attendance and Achievement in Urban Elementary and Middle Schools: An Instrumental Variables Approach. American Educational Research Journal available at: [http://69.8.231.237/uploadedFiles/Divisions/School_Evaluation_and_Program_Development_\(H\)/Awards/Cat_2_GOTTFRIED_ONLINE_FIRST.pdf](http://69.8.231.237/uploadedFiles/Divisions/School_Evaluation_and_Program_Development_(H)/Awards/Cat_2_GOTTFRIED_ONLINE_FIRST.pdf)

Lamdin, Douglas J. Evidence of Student Attendance as an independent Variable in Education Production Functions. The Journal of Educational Research available at: <http://www.gb.nrao.edu/~sheather/new%20lit/ContentServer.pdf>

characteristics and achievement levels. Ohio's mechanism for scoring school performance provided a number of (fairly complicated) ways of reaching various publicized designations. As a result, from a school or district perspective, improvement on any report card indicator could be pivotal (e.g., in demonstrating the type of improvement associated with NCLB's "safe harbor" provision, schools and districts could avoid having to meet a proficiency level if sufficient improvement was shown). And there have been rewards and sanctions associated with each of these potential designations, ranging from public shaming and levy problems to State and Federal rewards and sanctions.

Thus, there are three general features of the accountability system to emphasize. First, the incentives to scrub attendance data generally increased over time. Second, the sheer complexity of the system meant that any attendance scrubbing could be seen as potentially pivotal in reaching important performance thresholds, regardless of a school's demographic and educational characteristics. Third, school personnel need not be particularly calculating to benefit from withdrawing students with poor attendance or poor academic performance. Withdrawing a student with frequent absences, for example, has always stood to improve a school's designation—especially as the complexity of determining Ohio's performance ratings, as well as the stakes of these ratings, have increased.

Withdrawing a student with frequent absences has always stood to improve a school's designation—especially as the complexity of determining Ohio's performance ratings have increased.

7. SUPPORT ROLES IN ACCOUNTABILITY

Role of ODE

Pursuant to Ohio's organizational structure, ODE should ensure compliance with statewide policy by outlining accountability and other requirements of Federal and State laws so that the State, districts, school, and school boards can incorporate these requirements into their family involvement policies. In this role, ODE should communicate policy to districts, schools, school boards and stakeholder groups; monitor districts for compliance; and provide support and infrastructure for continued implementation of Federal and State family and community engagement policies.

ODE also provides expert technical assistance and support to facilitate the development and continuous improvement of programs for school, family and community partnerships.

As described in ODE's Recommended Roles and Responsibilities for Supporting School, Family, and Community Partnerships, ODE should:

- Provide adequate staff to monitor compliance of Federal and State laws and policies;
- Secure adequate funding for supporting State-level goals and provide guidance for district allocation of funding;
- Allocate funds for staff to develop tools and resources, and to conduct compliance reviews; and
- Provide guidance to districts in the use of federal entitlement funds, State funds and other funding sources available for supporting school, family and community partnerships.

As described earlier in this report, EMIS is ODE's primary system for collecting student, staff, course, program, and financial data from Ohio's public schools. The data collected via EMIS are used to determine both State and Federal performance accountability designations, produce the local report cards, calculate and administer State funding to school districts, determine certain Federal funding allocations, and meet Federal reporting requirements. The

data collected through EMIS provide the foundation for Ohio's soon-to-be developed P-20 Statewide Longitudinal Data System, intended to meet all of the America COMPETES Act elements. Also, ODE launched a newly redesigned EMIS system (EMIS-R) in January 2012. EMIS-R is intended to provide enhanced system functionality that will improve the timeliness and quality of the data while simplifying the process.

Role of Information Technology Centers and Student Information System Vendors

There are 23 governmental computer service organizations serving more than 1,000 educational entities and 1.8 million students in the State of Ohio. These organizations, known as Information Technology Centers (ITCs), and their users make up the Ohio Education Computer Network (OECN) authorized pursuant to §3301.075 of the Revised Code.

ITCs provide information technology services to school districts, community schools, joint vocational schools (JVS)/career & technical, educational service centers (ESCs) and parochial schools; however, not all schools subscribe to the same services. Therefore software applications can vary between schools, even if they are members of the same ITC.

As noted earlier, not all schools use an ITC. Typically larger school districts, such as Columbus CSD and Cleveland MCSD, maintain their own in-house data centers.

Schools use Student Information System (SIS) software applications to electronically manage student data. There are approximately 26 different SIS applications developed by various vendors used by schools in the State of Ohio. SIS applications are sometimes distributed by an ITC, but not always. Some schools contract with a vendor directly to obtain a SIS application or develop their own SIS in house. SIS applications are used to electronically store information related to:

- Student demographics
- Student scheduling
- Student attendance
- Student registration/enrollment
- Student withdrawal
- Student grades
- Student test scores

8. USE OF REPORTS AND OTHER DATA SOURCES

To complete this report, auditors gathered and assessed data from the selected school districts and conducted interviews with USDOE, ODE, ITC's, SIS vendors, and district personnel. Data from external sources, such as the SIS vendors, were not examined for reliability.

Auditors also used the following governing sources to assist in our review:

- Federal Family Educational Rights and Privacy Act (FERPA), 20 U.S.C. 1232(g)
- Individuals with Disabilities Education Act (IDEA), (Pub. L. No. 108-446; 20 USC 1400 et seq.)
- No Child Left Behind Act of 2001 (amending Title I, Part A, Elementary and Secondary Education Act (ESEA), 20 USC 6301 through 6339 and 6571 through 6578)

- American Recovery and Reinvestment Act (ARRA)
- Title I program regulations at 34 CFR part 200
- 2011 OMB Compliance Supplement
- The Education Department General Administrative Regulations (EDGAR) at 34 CFR parts 76, 77, 81, 82, 98, and 99
- Certain requirements of 34 CFR part 299 (General Provisions)
- ODE 2011 EMIS Manual
- Ohio Revised Code

9. METHODOLOGY

Report card data is submitted to ODE by each school district. The report card data is filtered through a special set of ODE business rules used to get the most accurate data for the accountability calculations. For example, the FAY rule limits the set of students whose data is used in the proficiency calculations to those who have been in the school or district the majority of the year. In most schools and districts, this is a subset of the students that are actually enrolled on testing day. When trying to show the instructive effectiveness of a school or district, it makes sense to limit the population to those students who were actually in the school or district the majority of the year. Many other ODE business rules are also applied to get the data that best represent what is happening in each school and district.

The data on a school or district's report card is reported to ODE through EMIS (Education Management Information System) by the district's EMIS coordinator over a series of reporting periods throughout the year. ODE does not require school districts in Ohio to utilize any particular SIS, nor does ODE establish minimum requirements for SIS. There are several SIS vendors throughout the State. The majority of data for the local report cards is submitted over the course of eight weeks during the summer. The data is extracted from the school's student information systems (SIS) and sent to ODE through the school district's Information Technology Center (ITC) or the district's own data center if they do not have a contracted service agreement with an ITC. New data can be sent each week if districts choose. Each week following data submission, a series of data verification reports are sent from ODE to district EMIS coordinators and ITCs. These reports are intended to help EMIS coordinators and ITCs ensure that the data was uploaded accurately and successfully. However, in practice, due to the fact the projections in the Secure Data Center show a school's and district's designations without the value-added component, *which can only improve a school or district's designation*, these reports provide schools and districts with incentive and opportunity to "scrub" their attendance and enrollment data submissions to improve report card results.

Amid these concerns and after irregular enrollment and attendance practices were discovered in the Columbus, Toledo, and Lockland school districts, the AOS initiated a statewide analysis of school attendance records to determine whether Ohio schools scrubbed attendance data and whether other problems existed in the EMIS reporting process.

AOS performed the following procedures for each of the selected schools or districts:

- Reviewed school's enrollment, attendance, and withdrawal policies and practices. Each board is required under Ohio Rev. Code §3321.191 to adopt a policy to guide employees in addressing and ameliorating the habitual truancy of students. For example, if the board has established an alternative school, assignment to the alternative school must be included in the policy as an interventions strategy.

- Traced breaks in student enrollment and other reasons for rolling the student to the State to supporting records to determine reasonableness and timeliness of the information being entered into the district's SIS. Pursuant to ODE's 2011 EMIS Manual Chapter 2, *Student Data*, supporting attendance records should include, but not be limited to:
 - Notes and other verification information relative to excused absences and tardiness;
 - Authorized medical excuses;
 - Expulsion notifications to students and parents or guardians;
 - Telephone and meeting logs describing nature and timing of contact with student parents or guardians and reasons for absence;
 - Notices to parents, guardians, and truancy officers demonstrating due process under Ohio Rev. Code §3321.191 and the board-approval truancy policies;
 - Court and parent/guardian orders for student placement in homes or institutions;
 - Transcript requests from other school districts supporting student mobility;
 - Evidence that the student completed course requirements but did not take the appropriate statewide assessments required for graduation;
 - Evidence that the student is 18 years old and no longer under the purview of the Compulsory Education Act; and
 - Other source documents such as lists of Limited English Proficient (LEP) students, students in open enrollment, students attending classes at an Educational Service Center (ESC), Career Technical Planning District (CTPD), or Joint Vocational School (JVS), and students enrolled in Post-Secondary Enrollment Options (PSEO).

All excuses from parents, and other documents, regardless of format or condition, become official attendance records. Ohio Rev. Code §3317.031 requires the, "membership record shall be kept intact for at least five years and shall be made available to the State Board of Education or its representative in making an audit of the average daily membership or the transportation of the district." "Membership record" encompasses much more than just attendance records. As defined in statute, it includes: "name, date of birth, name of parent, date entered school, date withdrawn from school, days present, days absent, and the number of days school was open for instruction while the pupil was enrolled."

9.1. JOHN GLENN SCHOOL OF PUBLIC AFFAIRS, THE OHIO STATE UNIVERSITY

In conducting this audit, the AOS worked extensively with The John Glenn School of Public Affairs at The Ohio State University to develop statistical procedures and data management strategies in support of audit goals. The AOS conducted its testing of student attendance data and accountability in three phases, as described below:

Phase One

AOS reported on Phase One in its *Interim Report on Student Attendance Data and Accountability System* dated October 4, 2012. For this first phase, AOS initially selected 100 schools with the highest number of students that took the State assessments and whose test scores were subsequently rolled up to the State based on a break in enrollment or change in the WKC. However, AOS noted two districts, Columbus City School District and Cleveland Municipal City School District, had a large number of schools included in the initial selection. In an effort to achieve more diverse coverage in Ohio schools selected for initial testing, AOS narrowed the schools in the Columbus CSD and Cleveland MCSD to only ten and 15 schools, respectively, based on the schools with the greatest number of students rolled up to the State's report card. Furthermore, AOS selected an additional 28 school districts to include in its testing sample. The goal of the first phase of testing was to obtain a general understanding of how the EMIS system operates and how schools might use breaks in enrollment to improve report card results. The data collected from this testing was used in later phases to determine the most effective and efficient testing approach.

Phase Two

AOS reported on Phase Two in its *Interim Report on Student Attendance Data and Accountability System* dated October 23, 2012. The goal of the student attendance reviews was to ensure compliance with Ohio's accountability system. Obviously, no matter how competent the auditor or how sophisticated the school's student information system and enrollment processes, reviewing each student's enrollment documentation for all schools is a physical impossibility. Even if 100 percent of Ohio's tested students rolled up to the State report card could be examined, the cost of testing would likely exceed the expected benefits (the assurance that accompanies examining 100 percent of the total) to be derived. The cost per student file examined was approximately \$30 as of October 23, 2012. Because of this cost-benefit challenge, AOS applied widely utilized sampling techniques, discussed below, and contracted with the Ohio State University (OSU) for expert statistical consulting services in an attempt to develop meaningful statistical predictors for the balance of its work.

The Ohio State University's Statistical Analysis

AOS requested that OSU balance two goals: 1) the identification of schools that are more likely than others to be scrubbing attendance data and 2) the generation of a data set that aid in uncovering statistical predictors of scrubbing. To achieve these goals, OSU performed the following:

- Reviewed key features of Ohio's accountability system and the associated incentives for scrubbing attendance data;
- Identified some school and district data that AOS might consider in selecting schools to examine;

- Provided details of a sampling procedure that AOS used to identify schools that are more likely to engage in data scrubbing and facilitate the identification of predictors of attendance scrubbing.

Due to AOS time and resource constraints, the OSU recommended sampling procedure emphasized the identification and analysis of publicly available data that were relatively easy to gather and that provided sorting information that could be valuable in light of the incentives introduced by Ohio's accountability system. Specifically, OSU recommended identifying schools with unusually large changes in their reported attendance and mathematics proficiency rates between the 1995-1996 and 2010-2011 school years, as well as those with an unusually large proportion of their students whose scores were "rolled up" to the State level during the 2010-2011 school year, through comparisons with similar schools (in terms of tested grade levels and district demographic characteristics). Thus, the statistically rigorous OSU strategy entailed identifying schools that had unusual roll-up rates and unusual gains in their attendance and proficiency rates.

AOS used this ranking to select a sample of schools with levies on the November ballot for Phase Two of the student attendance testing. AOS excluded schools previously examined in the first phase of the attendance review from the second-phase levy schools sample. As a result, AOS examined 81 schools from 47 school districts out of a statewide total of 184 school districts with levies on the November ballot.

This strategy had a number of advantages over alternative—perhaps more involved—ones. First, given the incentives of Ohio's accountability system, the math, attendance, and roll-up measures were expected to help identify schools that were scrubbing data for the purpose of improving reported performance statistics. Second, focusing on within-school performance changes over time, as well as characterizing the unusualness of school performance with comparisons to schools in similar districts and with similar tested grades, helped stratify the sample of schools so that it was representative of Ohio's diversity. This second feature was important for generating a school-level dataset that helped AOS identify statistical predictors of scrubbing to be used in the final phase of the examination. Last but not least, the timely examination of schools with levies on the November ballot aided the public in making informed voting decisions.

The Ohio State University Recommendation for Identifying Unusual Roll-up Rates

AOS selected the first 100 schools to examine in Phase One based, in large part, on their 2010-11 school year withdrawal rates for tested students. Specifically, AOS identified the percentage of tested students whose scores were rolled up to the State level due to the student being withdrawn. This indicator is closely tied to the attendance scrubbing practices that are the focus of the examination. Given the goals of the AOS school sampling strategy for Phase Two (described above), OSU recommended AOS identify schools with unusual roll-up rates compared to other schools serving similar grades (i.e., elementary, middle, and high schools) and that reside in similar districts (as per ODE's seven-category district typology). OSU and AOS expected this strategy to help account for the correlation between student mobility and school and district types.

The Ohio State University's Recommendation for Analyzing Relative Attendance Rate Gains over Time

As discussed above, withdrawing students with frequent absences could enhance performance on consequential report card indicators. Assuming that withdrawals indeed increase atten-

Assuming that withdrawals increase attendance rates, looking for unusually large increases over time in school attendance rates is one way of identifying schools for further study.

dance rates, looking for unusually large increases over time in school attendance rates is one way of identifying schools for further study.

Whereas attendance rates may not have been calculated identically over time, OSU indicated that this variability should not pose too severe a problem for AOS purposes. That is because the quantity of interest is the relative attendance changes across schools. What is necessary to ensure comparability is that any changes made to the attendance formula affects schools similarly from year to year. Thus, while the absolute changes in attendance calculated may be invalid in terms of identifying trends in attendance rates, the relative changes in attendance rates are likely to capture the schools and districts with relatively unusual changes in attendance rates over time.

Another potential complication is that schools that include different grades have different student populations. One might expect more or less significant incentives to increase attendance rates depending on the student population at hand. The greatest gains might occur where attendance problems are the greatest—for example, urban high schools, as opposed to suburban elementary schools. On the other hand, attendance rates figure directly into elementary and middle school AYP calculations, whereas the graduation rate is used in high schools. Stratifying by school and district type and then ranking schools by attendance gains was the option OSU recommended for addressing such issues.

The Ohio State University's Recommendation for Analyzing Relative Mathematics Proficiency Gains over Time

According to the results of the AOS Phase One examination, a potential purpose of withdrawing students was to increase the percent of students achieving proficient designations at the school and district levels. Student test scores are highly correlated with one another and some test subjects have figured more prominently in Ohio's accountability system, so OSU recommended focusing on a single tested subject: mathematics. Mathematics has played a prominent role in all four of Ohio's performance calculations and the availability of mathematics proficiency data met the requirements of the proposed analysis.

State testing has changed significantly over time. For example, mathematics tests were administered in the 4th, 6th, 9th, and 12th grades in the late 1990s. Today, they are administered in grades 3 through 8, as well as in grade 10. Additionally, the type of tests administered (and the academic standards on which they are based) changed. For example, the original proficiency tests were replaced with criterion-referenced assessments in order to comply with changes in State and Federal law. Finally, the cut scores that identify student proficiency also were adjusted. Thus, school performance ratings may have gone up or down simply because of changes in the testing and accountability system.

OSU felt that the changes in the cut scores and tests administered probably were not too problematic for AOS purposes. That is because, as with the attendance rate change calculation, the quantities of interest are the relative rate changes among schools, rather than absolute changes. However, the variation in tested grades across schools and over time are potentially problematic. Schools with different tested grades may have faced relatively lower or higher proficiency bars over time simply because of changes in testing. One partial solution was to identify tests administered in all years since the 1998-99 school year and to compare achievement gains in schools that include the same tested grades. In particular, mathematics proficiency rate data were available for grades 4, 6, and 10 for all years since the 1998-99 school year. OSU recommended comparing proficiency rate changes for schools that had the same highest tested grades (e.g., compare 4th grade mathematics proficiency gains for schools whose

highest of the three listed grades is the 4th grade), as withdrawing students is more likely to pay dividends as schools deal with students in higher grades.

It is worth noting that, like the attendance measure described above, examining mathematics proficiency gains is far from a perfect strategy. Math proficiency rates are not perfect determinants of school designations and the possibility of rewards and sanctions. In addition, schools' varying circumstances affect the extent to which OSU and AOS can characterize proficiency gains as unusual. The OSU-recommended school sampling strategy entails accounting for district demographics for this reason. And, as mentioned above, looking at rate changes also helped account for variation in school circumstances.

The Ohio State University Recommendation for School Sampling – Generating a Representative Sample

As described earlier, OSU recommended that examining the unusualness of changes in schools' attendance and mathematics proficiency rates, as well as the unusualness of schools' withdrawal rates for tested students, could help in identifying schools that scrub data in order to improve performance on Ohio's report cards. The AOS was also interested in sampling schools so that statistical predictors of scrubbing may be identified and valid inferences may be drawn regarding the scope of scrubbing across Ohio's diverse schools. The OSU recommendation that AOS determine the unusualness of school statistics—based on comparisons with schools serving similar grades and that reside in comparable districts—was meant to simultaneously promote both of these goals. As discussed above, there were potential advantages to making such comparisons when it comes to identifying schools that scrub in order to improve performance on Ohio report cards. Additionally, generating statistics of unusualness based on such comparisons ensures that schools could be drawn from the range of school types (elementary, middle, and high schools) and district types (in terms of district demographics).

The ODE makes publicly available on its website a district taxonomy that consists of eight categories: (1) Rural/agricultural (with high poverty, low median income), (2) Rural/agricultural (with small student population, low poverty, low to moderate median income), (3) Rural/Small Town (with moderate to high median income), (4) Urban (with low median income, high poverty), (5) Major Urban (with very high poverty), (6) Urban/Suburban (with high median income), (7) Urban/Suburban (with very high median income, very low poverty), and (8) Joint Vocational School Districts. These are oft-used categories in Ohio; therefore, OSU and AOS used these categories to stratify the population of schools.

Additionally, as mentioned above, OSU felt identifying elementary, middle, and high schools and sampling within these school types also could be beneficial. Categorizing schools in this way is not always straightforward because school grade ranges vary. OSU recommended that school types be based on the tested grade on which the mathematics proficiency rate gains are calculated. Thus, if the analysis focuses on 4th grade, 6th grade math, and 10th grade math exams, one could use those tested grades to identify schools. Specifically, OSU recommended identifying schools based on the highest of these tested grades (elementary=4th grade; middle=6th grade; and high=10th grade).⁴

Examination of Student Files and Creating a District "Exclusion List" in Phase Two

Auditors frequently use audit sampling procedures to obtain audit evidence. The American Institute of Certified Public Accountants (AICPA) auditing standards define audit sampling as

⁴ It is atypical to identify a school as a "middle school" because it includes grade six. OSU recommended it purely for the purpose of implementing the sampling strategy. This is reasonable because the sixth grade is an intermediate grade level.

the application of an audit procedure to less than 100 percent of the items within an account balance or class of transactions for the purpose of evaluating some characteristic of the balance or class. In other words, audit sampling may provide auditors an appropriate basis on which to make inferences about a population based on examining evidence from a subset of the population. When using audit sampling, the auditor may choose between a statistical and a non-statistical approach. Both methods are acceptable under these standards. Also, AOS does not rely solely on the results of any single type of procedure to obtain sufficient appropriate audit evidence. Rather, audit conclusions were based on evidence obtained from several sources and by applying a variety of audit procedures.

Unlike the first-phase schools and districts where AOS examined 100 percent of tested students rolled up to the State report card, AOS selected a sample of students from individual schools to test in Phase Two of the attendance review. AOS believed a sampling approach was appropriate to communicate the results of the statewide student attendance review expeditiously while simultaneously ensuring the costs do not outweigh the relative benefits for the work performed. The AICPA's auditing standards impose no requirement to use quantitative aids such as sample size tables, to determine sample size, nor do they impose a rule regarding minimum sample size. The auditor's professional judgment is the key to determining appropriate sample sizes. For purposes of testing the Phase-Two schools with levies, AOS chose to sample 30 tested students for most schools. AOS selected this sample size based, in part, on the AICPA's attribute sampling tables, the relatively small population of students rolled up to the State report card at most schools, the expected rate of deviation, and the anticipated cost-benefit of testing more than 30 students at an individual school.⁵

Finally, AOS analyzed the proportion of tested students rolled up to the State report card for all schools (both levy and non-levy schools) and ordered schools according to their roll-up rates. AOS identified school districts for which all school were in the bottom 25% of the "tested students rolled up to the State percentage" category. There were 26 school districts (refer to section 13 of this report for a list of these school districts) that met these criteria and were excluded from AOS attendance testing due to the remote likelihood of their having scrubbed attendance data.

Ohio State University's Protocol for Quantifying School Unusualness

OSU recommended the following protocol for collecting and analyzing data for the purpose of quantifying how unusual a school is in terms of its State roll-up rate and its gains in attendance and mathematics proficiency rates.

These were the necessary data for conducting the analysis:

- District names and ID numbers (IRNs)
- ODE's "similar districts" typology
- School names and ID numbers
- School-level attendance rate data from the 1995-96 through 2010-11 school years
- School-level mathematics proficiency rates by grade for all students from the 1998-99 through 2010-11 school years
- Roll-up rates for the 2010-11 school year

Besides the roll-up rates, all of these data are publicly available on the ODE website. OSU

⁵ AOS tested 100 percent of the tested students rolled up to the state report card for certain phase-two schools that were tested prior to the finalization of the AOS sampling methodology. AOS also tested 100 percent of the tested students rolled up to the state report card where schools had less than 30 or slightly more than 30 tested students.

recommended the following procedures for AOS to quantify the unusualness of a school's roll-up rates and attendance and proficiency gains based on the above data:

1. Create a single data file with one school per row. The list of schools on the "roll-up rate" file provided to AOS by ODE can serve as the master list of public schools.
2. Create a variable that identifies the district types according to the coding scheme on the ODE website, which includes these seven K-12 categories: "Rural/agricultural – high poverty, low median income," "Rural/agricultural – small student population, low poverty, low to moderate median income," "Rural/Small Town – moderate to high median income," "Urban – low median income, high poverty," "Major Urban – very high poverty," "Urban/Suburban – high median income," "Urban/Suburban – very high median income, very low poverty." (The eighth category, Joint Vocational School Districts, is not included in this analysis.)
3. Create a variable that identifies whether a school is an elementary, middle, or high school by identifying whether there is a proficiency score in 4th, 6th, or 10th grade using the 2010-2011 school year data. Some schools include grades that span two or all three school types. As noted above, OSU recommended coding a school based on the highest of the three tested grades.
4. Create a variable that identifies each school-type and district-type combination, for a total of 21 school categories (e.g., a middle school in a suburban district would be one category).
5. Create 15 attendance rate change measures for each school, corresponding to each year available prior to the 2010-11 school year. Then, create a single attendance rate change measure that identifies the largest of the 15 attendance rate changes up to 2011 (1996-2011, 1997-2011, 1998-2011, ... , and 2010-2011).
6. Identify the school grade level to be used to calculate mathematics proficiency rate changes. Create 12 proficiency rate change measures for each school, corresponding to each year available prior to the 2010-11 school year. Then, create a single proficiency rate change measure that identifies the largest of the 12 attendance rate changes up to 2011 (1999-2011, 2000-2011, 2001-2011, ... , and 2010-2011).
7. Using the highest attendance and proficiency rate changes for each school, create a measure that indicates how large the changes are compared to other schools in the same school/district category for that same year. Specifically, OSU recommended calculating z-scores for these changes across the 21 school- district-type combinations. Z-scores quantify how many standard deviations from the school- and district-type mean a school's highest rate change is for a given year—that is, z-scores quantify the unusualness of a school's rate changes.
8. Calculate z-scores for the 2010-11 school year roll-up rates for each of the 21 school-district-type combinations. Again, the z-score identifies the unusualness of that rate.
9. OSU recommended that the AOS create a single measure of a school's unusualness, perhaps by averaging the z-scores for attendance and proficiency rate changes, and for the roll-up rates. After creating this single measure, OSU recommended sorting all K-12 public schools according to the measure, from highest to lowest.
10. After schools are sorted based on the measure of unusualness, OSU recommended that the AOS start at the top and work down the list to examine as many schools as possible given available resources, so that a diverse sample of schools is examined.

Phase Three

For Phase Three, OSU provided assistance in developing a statistically valid method for sampling the remaining schools for testing. To recap, Phase One focused primarily on 100 schools associated with relatively high student mobility rates. Phase Two focused on a sample of 81 schools with levies on the November ballot, selected in part for their representativeness of Ohio public schools. For Phase Three, OSU suggested AOS:

OSU provided assistance in developing a statistically valid method for sampling the remaining schools for testing.

- Identify measures predictive of attendance scrubbing using the results from Phases One and Two;
- Assign to each school in Ohio a predicted probability of scrubbing based on these predictive measures; and
- Select a probability cutoff above which the AOS might examine a school for Phase Three.

The predictors of attendance scrubbing identified were the following:

- Proportion of a school's students withdrawn associated with each of four EMIS withdrawal codes (e.g., **6, 40, 41, and 71);
- Greatest change in a school's attendance rate recorded among all years since the 1995-96 school year (using the 2010-11 school year as the terminal year for every rate-change calculation);
- Greatest change in a school's mathematics proficiency rate recorded among all years since the 1998-99 school year (using the 2010-11 school year as the terminal year for every rate-change calculation).

Together, these predictors account for much of the variation in attendance scrubbing identified across the 181 schools⁷ that AOS examined in Phases One and Two.

Using these predictors to estimate a probability of scrubbing for each elementary and secondary school (as per the statistical approach detailed in this report) allowed AOS to rank-order all school according to their predicted probabilities of scrubbing. Due to AOS resource and time constraints, AOS determined that a predicted probability of 0.06 was a reasonable cutoff for generating a list of schools to investigate, as 100 percent of schools already identified as a school with evidence of scrubbing are associated with estimated probabilities above this threshold. There were 172 schools associated with predicted probabilities above the proposed 0.06 cutoff, 70 of which AOS already examined in the first two phases.

The Ohio State University's Procedure for Constructing Predictive Measures

The first two phases of the AOS examination into attendance data generated information on 181 schools. The AOS identified 36 of the 181 schools as having scrubbed⁸ attendance records—that is, the AOS determined that these schools had systematically failed to provide proper documentation or justification for student withdrawals. The AOS requested that OSU use these data to identify school-level statistical measures that help predict whether the investigation identified schools as schools with evidence of scrubbing.

⁶ The double-asterisk is the default code EMIS uses to indicate some other event significant to the break in enrollment.

⁷ AOS selected an additional 28 school districts with lower student withdrawal rates for testing. A goal of the first phase of testing was to obtain a general understanding of how the EMIS system operates and how schools might use breaks in enrollment to improve report card results.

⁸ Scrubbing is the practice of removing students from enrollment without lawful reason, regardless of the purported motivation. The term "scrubbing" does not necessarily imply malicious intent.

Recall that the procedure employed for selecting 81 schools with levies on the November ballot to investigate in Phase Two was meant in large part to improve AOS's ability to identify predictors of attendance scrubbing. The manner in which schools were selected in Phase Two took account of district demographics and school grade levels. This produced a stratified sample that should moderate the extent to which sample selection bias affects the usefulness of the predictors of scrubbing for selecting additional schools to investigate during Phase Three.

OSU recommended AOS consider statistical measures constructed using data that ODE already provided—specifically, counts of the frequency with which student withdrawals are associated with each EMIS withdrawal code—as well as school-level mathematics proficiency rates and attendance rates used during Phase Two. Measures created based on these data correlate relatively well with whether AOS identified a school as a school with evidence of scrubbing in the first 181 schools examined.

The Ohio State University's Recommendation for Analyzing Counts by EMIS Withdrawal Code

AOS obtained from ODE the frequency with which student withdrawals by school during the 2010-11 school year were associated with 16 different EMIS withdrawal codes: **, 40, 41, 42, 43, 45, 46, 48, 51, 52, 71, 72, 73, 74, 75, and 99.⁹ There are a number of ways to create measures based on these counts. OSU found that measures that capture the proportion of a school's students withdrawn using each code yields some predictive power. Specifically, in pairwise correlations with a dichotomous "scrubber" variable, the measures "proportion **", "proportion 40," "proportion 41," "proportion 42," "proportion 51," and "proportion 71" yield the largest correlation coefficients (0.40, 0.23, 0.54, 0.14, 0.13, and 0.41, respectively). However, a statistical model that includes all of these measures to estimate the probability of scrubbing yields unstable results when "proportion 51" is included. Thus, OSU suggested AOS employ "proportion **," "proportion 40," "proportion 41," "proportion 42," and "proportion 71" as variables to predict potential scrubbing.

The Ohio State University's Recommendation for Analyzing Attendance Rate Changes

As described in OSU's guidance document for Phase Three, examining gains over time in school-level attendance rates could provide some advantages in identifying schools that scrubbed attendance data. Schools may have discovered over time the benefits of selectively withdrawing students to enhance their standing on the report cards. Examining attendance rates over time might reveal relatively substantial increases, which could be suggestive of scrubbing or unusual improvement in school performance. Additionally, examining changes in attendance rates to some extent allows one to account for differences between schools (e.g., differences in student populations) by comparing 2010-11 school year attendance rates (corresponding to the year for which the AOS has withdrawal data) with previous attendance rates (perhaps capturing a school's "true" or "natural" attendance rate). Finally, analyzing such changes over time may be particularly useful in light of the limitations of the withdrawal data described above, as they do not allow for comparisons over time.

A significant limitation of the attendance rate data is that they are censored. Specifically, the ODE does not report a school's precise attendance rate if that rate exceeds 95%. Thus, the potential to detect a significant increase in attendance decreases as a school's true attendance rate increases. (This always is a potential concern when examining educational improvements, as there is necessarily a ceiling at 100% on attendance and proficiency rates on tests. However, in

Examining attendance rates over time might reveal relatively substantial increases, which could be suggestive of scrubbing or unusual improvement in school performance.

⁹ Refer to Chapter 2, *Reporting Student Data*, of the 2011 ODE EMIS Manual for more information.

this case, ceiling effects are likely to be especially pronounced for attendance rates due to the high number of schools with attendance rates exceeding 95%.) To mitigate the impact of this censoring, OSU recommended the AOS use attendance rate increases as a predictive measure only when there is no such censoring. Additionally, because AOS was concerned whether or not a school was currently scrubbing attendance data, OSU recommend examining changes in attendance up to fiscal year 2011 (the last year of available data, which corresponds to the year of available withdrawal data).

OSU recommended:

- Calculating 15 measures of attendance rate changes for each school (1996-2011, 1997-2011, 1998-2011, ... , and 2010-2011), corresponding to each year available prior to FY2011;
- Creating a single “attendance rate change” measure that identifies the biggest rate “gain” (which may be negative) across the 15 pairs of years;
- Discarding change measures based on pairs of years for which one of the two attendance rates used (particularly the fiscal year 2011 attendance rate) is greater than 95%.

Creating an attendance rate change measure using the procedures described above provided some power in predicting whether the AOS identified schools with evidence of scrubbing. The correlation between the “greatest attendance rate change” measure and the dichotomous variable indicating whether the AOS identified a school with potential scrubbing yields a correlation coefficient of 0.55. It is worth noting that the addition of this variable to a statistical model that includes the four withdrawal code variables does not help (nor does it hinder) the model’s ability to predict the identification of potential schools with evidence of scrubbing. Nonetheless, OSU recommended using this measure to help select schools, as there are good theoretical reasons to believe that attendance rate gains should be tied to potential scrubbing. Additionally, the inclusion of this measure along with the mathematics proficiency measure (described below) did enhance predictive power.

The Ohio State University’s Recommendation for Analyzing Changes in Mathematics Proficiency Rates

The final measure OSU recommended employing in a predictive model was one that captured changes in mathematics proficiency rates. Once again, the logic behind including such a measure is explained in the OSU guidance document for Phase Two. The procedure OSU recommended for constructing the measure is analogous to the procedure for the “greatest attendance rate change” measure detailed above. There are two key differences, however. First, data on the percent of students that scored at the proficient level or better on mathematics exams is available starting from fiscal year 1999. Thus, the “greatest mathematics proficiency rate change” measure must be based on the highest value across twelve pairs of years.

A second difference is that there is no aggregate, school-level mathematics proficiency rate that is comparable over time. As described earlier, OSU recommended AOS focus on proficiency rates for 4th, 6th, and 10th grade students. There are passage rates in mathematics available for every year (1999-2011) at these grade levels. To calculate school-level rate changes, OSU recommended that AOS focus on the highest of these three grade levels in a given school, as the value of scrubbing for improving proficiency rates is likely to increase as student populations get older and attendance becomes more difficult to control.

A pairwise correlation between this measure and the scrubbing indicator yields a correlation coefficient of -0.21, indicating a negative relationship. Moreover, the addition of this vari-

able to a statistical model that includes the four withdrawal code variables does not help the model's ability to explain the identification of potential schools with evidence of scrubbing. As with the "greatest attendance rate change" measure, however, OSU's conceptual framework motivated their recommendation that AOS employ the "greatest mathematics proficiency rate change" to select schools. Additionally, described below, there appeared to be some explanatory benefits to including both the attendance and proficiency rate-change variables in a model estimating the probability that AOS identified a school with potential evidence of scrubbing.

The Ohio State University's Procedure for Estimating School-level Predicted Probabilities

AOS predicted probabilities of scrubbing for all Ohio public schools by estimating a statistical model for the 181 schools examined in the first two phases of the investigation. Specifically, OSU recommended the estimation of a probit model that included the six measures described above (*proportion ***, *proportion 40*, *proportion 41*, *proportion 42*, *proportion 71*, *greatest attendance rate change*, and *greatest mathematics proficiency rate change*) as predictor variables and a dichotomous "scrubber" variable (indicating whether AOS identified a school with evidence of scrubbing) as the predicted variable. Estimating such a model revealed how the six predictor variables related to the scrubbing indicator for the 181 schools. Using these estimates, AOS estimated a predicted probability of scrubbing for every school (whether or not AOS examined the school).

AOS predicted probabilities of scrubbing for all Ohio public schools by estimating a statistical model for the 181 schools examined in the first two phases of the investigation.

A complication in estimating the statistical model is that there are missing values for the mathematics and attendance measures for some schools (often due to censoring in reported attendance rates). One method for dealing with this problem is to impute missing values. OSU explored various imputation methods but ultimately found that a relatively straightforward procedure generated probabilities that predicted best whether a school was identified as having scrubbed attendance data. Specifically, the procedure entails estimating multiple models such that schools associated with missing values for any variable are omitted from the estimation. Additional models with fewer variables are estimated until a predicted value is obtained for each school. Using this procedure, 34 percent of schools have predicted probabilities based on all six variables; 54 percent based on all but the attendance measure; three percent based on all but the mathematics measure; and six percent based solely on the withdrawal code measures.

OSU examined measures of model fit and found that this procedure provided good predictive value for the 181 schools examined. For example, the pseudo R-squared statistic for the fully specified probit model is 0.83, which indicates that the model captures a lot of the observed variation in scrubbing for the subset of observations used to estimate that model. Another example of the procedure's potential usefulness is that selecting the 172 schools (out of over 3,000) associated with the highest predicted probabilities captures all 36 schools that AOS identified having scrubbed in the first two phases of the investigation.

The extent to which the predicted probabilities are useful for identifying additional schools depends on the representativeness of the 181 schools. The 181 schools are somewhat unusual because they have relatively high student withdrawal rates and relatively large gains in attendance and mathematics proficiency rates. However, the withdrawal rates and attendance and mathematics gains employed to select the 81 schools for Phase II took account of school and district types, ensuring that the sample of schools selected was representative of Ohio's diverse district demographics and school levels. This sampling procedure should mitigate concerns about the generalizability of the model on which the predicted probabilities are based. In light of the time and data constraints (which required that Phase II data collection serve two purposes), this sampling procedure was arguably the best option.

The Ohio State University's Recommendation for Generating a List of Schools to Investigate

Ideally, AOS would have investigated all schools to determine the extent of potential attendance scrubbing. But that is unrealistic. Due to the time and resource constraints AOS faced, it was a reasonable strategy to select additional schools based on whether they exceed some cutoff in the predicted probability generated by the procedure described above. OSU and AOS felt it was reasonable for AOS to set that cutoff at 0.06, as the schools AOS identified as having scrubbed all are associated with predicted probabilities above this cutoff. This cutoff generated a list of 172 schools, 70 of which AOS had already examined. Given the AOS's available time and resources, this was also a feasible strategy.

10. SUMMARY OF RESULTS

The following is a summary of AOS testing results over enrollment for the 2010-11 school year on selected schools and school districts.

10.1. SYSTEMIC STATEWIDE ISSUES

Lack of Written Attendance Policies

The NCLB Act includes Federal flexibilities and policies to States for designing their own student attendance requirements, which are not static. The U.S. Congress has allowed states to determine the required number of school days in a school year and develop their own truancy process. **The NCLB Act already includes factors to take into consideration the law of averages by removing the worst and best students in school and districts from significant report card computations so that no school or district is penalized or rewarded for its outliers.**

Ohio Rev. Code §3321.19 defines truancy and empowers Ohio school governing boards to adopt their own policies for intervention and withdrawal of students. If a parent, guardian, or other custodian of a habitual truant fails to cause the child's attendance at school, the board of education may proceed with an intervention strategy in accordance with its adopted policy, may initiate delinquency proceedings, or both. Each board is required under Ohio Rev. Code §3321.191 to adopt a policy to guide employees in addressing and ameliorating the habitual truancy of students. If the board has established an alternative school, assignment to the alternative school must be included in the policy as an intervention strategy.

Currently, while certain school association organizations provide sample policies, ODE does not have written business rules that provide specific policies or direction to school boards. Based on the intent of the State and Federal statutes that follow, it is clear that school boards should immediately notify students and their parents or guardians that the student is deemed truant, provide an opportunity for intervention, counseling, truancy prevention mediation, and parental involvement programs; notify the Registrar of Motor Vehicles, if applicable; take appropriate legal action; and assign the student to an alternative school prior to a school withdrawing the student due to truancy. Additionally, Ohio Rev. Code §3321.13 (B)(2) requires the Superintendent develop administrative guidelines that establish proper procedures so the student and his/her parents are provided the opportunity to challenge the attendance record prior to notification and withdrawal of students.

The concept of due process prior to withdrawal of truant students is further emphasized by the NCLB Act and IDEA. The NCLB Act requires every Title I eligible child be served under the program. Withdrawing students prior to receiving due process inaccurately inflates the school's AYP report card rating, which results in an understatement of Title I allocations to the eligible schools within a school district. Overstatement and understatement of Title I allocations can impact federal funding in other federal programs since ODE must use Title I funding allocations to distribute a host of other Federal programs to schools, such as the federal Perkins Career Technical funding.

Similarly, IDEA requires school districts provide an alternative setting for the education of students that are legitimately truant. Failure to provide an opportunity for truant students to receive an alternative means of education is a fundamental violation of the intent of IDEA.

AOS identified systemic concerns regarding the withdrawal of students due to truancy without court adjudication. While most schools had written policies for truancy, these policies were incomplete, lacked clearly defined procedures for withdrawal, or contravened the clearly stated statutory due process proceedings for truant students. Refer to Section 12 of this report for lists of schools with systemic issues (i.e., scrubbing) and episodic errors pertaining to incomplete or poorly defined student withdrawal policies.

The lack of clearly defined written procedures for truancy and withdrawal of students at the district level, including specified due process for students and parents and strategies for intervention, prior to a student's withdrawal from a school's report card creates inconsistencies in the local report card ratings. Additionally, since schools receive federal award allocations based both on U.S. Census data and their corresponding school report card rankings, with lower ranking schools receiving a higher percentage of available federal funding, a school's failure to count all students being educated within the school neglects students that have a right to be served by federal programs.

The lack of clearly defined written procedures for truancy and withdrawal of students – including specified due process for students and parents and strategies for intervention – prior to a student's withdrawal creates inconsistencies in the local report card ratings.

Lack of Due Process Prior to Withdrawal

Special provisions of the law apply to any student who is considered to be either a “habitually truant” or a “chronic truant”. Ohio Rev. Code §2151.011 defines “habitual truant” as a school-age child who is absent from school without legitimate excuse for five or more consecutive days, seven or more days in a school month, or 12 or more school days in a school year. Ohio Rev. Code §3313.62 defines a “school month” as four school weeks. Ohio Rev. Code §2151.011 and §2152.02 define a “chronic truant” as a school-age child who is absent from school without legitimate excuse for seven or more consecutive days, ten or more days in a school month, or 15 or more days in a school year.

If a parent, guardian, or other custodian of a *habitual* truant fails to cause the child's attendance at school, the board of education may proceed with an intervention strategy in accordance with its adopted policy, may initiate delinquency proceedings, or both, pursuant to Ohio Rev. Code §3321.19. Each board is required under Ohio Rev. Code §3321.191 to adopt a policy to guide employees in addressing and ameliorating the habitual truancy of students. If the board has established an alternative school, assignment to the alternative school must be included in the policy as an interventions strategy.

If the parent, guardian, or other custodian of a *chronic* truant fails to cause the child's attendance at school, the board must proceed directly with the filing of delinquency proceedings in the juvenile court by filing a complaint jointly against the student and the parent, guardian, or other custodian to have the child declared a delinquent child by reason of such truancy Ohio Rev. Code §3321.19.

The concept of due process prior to withdrawal of truant students is further emphasized by the NCLB Act and IDEA. The NCLB Act requires every Title I eligible child be served under the program. Withdrawing students prior to receiving due process inaccurately inflates the school's AYP report card rating, which results in an understatement of Title I allocations to the eligible schools within a school district. Overstatement and understatement of Title I allocations can impact federal funding in other federal programs since ODE must use Title I funding allocations to distribute a host of other Federal programs to schools, such as the federal Perkins Career Technical funding.

Similarly, IDEA requires school districts provide an alternative setting for the education of students that are legitimately truant. Failure to provide an opportunity for truant students to receive an alternative means of education is a fundamental violation of the intent of IDEA.

A child is not truant until a court adjudicates the child truant under the statutes noted above, and therefore, cannot be withdrawn from a school for reason of truancy prior to the court's adjudication.¹⁰

However, for the schools examined, AOS found the following schools had systemic weaknesses in the application of due process and withdrew students without court determination of truancy:

- Campbell CSD
- Cleveland MCSD
- Columbus CSD
- Toledo CSD
- Cincinnati CSD

As a result, the district and school report cards could potentially be misstated due to these students being sent to the State's report card without court determination of truancy. Refer to Section 12 of this report for lists of schools with systemic issues (i.e., scrubbing) and episodic errors pertaining to incomplete or poorly defined student withdrawal policies.

Maintaining Official Student Attendance Records

The Family Educational Rights and Privacy Law (FERPA), 20 U.S. Code, protects the rights of students and their parents regarding confidentiality, access to information and entitlement to a due process hearing if a disagreement arises. Parents and eligible students must be notified annually of their rights under FERPA.

Among other things, this law requires that a school must maintain: (1) a log of requests for access to information from education records as long as the records themselves are maintained; (2) parental statements commenting on student records as long as the records are maintained; and (3) educational records for which there is an outstanding request by a parent to inspect or review.

IDEA, 20 U.S.C. 1400, provides all students with a Free Appropriate Public Education (FAPE). Regarding student records, IDEA provides parents with the right to request that school officials destroy records which are no longer needed.

Section 427 of General Education Provisions Act (GEPA), 20 U.S.C. 1232f, requires public school entities to include in their applications for Federal funds an explanation of how its pro-

¹⁰ Note that Ohio law treats differently "withdrawal" (ORC 3321.13) and truancy (ORC §3321.19 *et seq.*). Withdrawal is an action that must have a statutorily authorized reason; "truancy" is one of many authorized reasons.

gram will ensure equitable access for students, teachers, and other program beneficiaries with special needs. This law states that recipients of federal funds must retain records for three years after the completion of the activity for which funds are used. Special education records such as Individualized Education Plans (IEPs) and evaluations reports are examples of records covered by GEPA's records retention requirements.

However, Ohio Rev. Code §3317.031 includes a more restrictive burden for maintaining school attendance records. All excuses from parents, and other documents, regardless of format or condition, become official attendance records. Ohio Rev. Code §3317.031 requires this membership record be kept intact for at least five years and shall be made available to the State Board of Education or its representative in making an audit of the average daily membership or the transportation of the district. Since the Ohio Rev. Code is more restrictive, the five-year requirement for student records retention from Ohio Rev. Code §3317.031 supersedes the three-year period specified in federal legislation.

Ohio law requires this membership record (attendance) be kept intact for at least five years and made available for audit.

Although Ohio is under a flexibility waiver, student attendance is still a required part of the revised accountability structure under State law, which cannot be waived by the Federal government. Therefore, schools must maintain adequate student attendance records to support attendance events reported in EMIS to ODE, which are then included in the calculation of the local report cards. Based on the testing results, the lack of appropriate student attendance records is an important concern.

The majority of schools maintain some supporting documentation to support breaks in enrollment as reported to ODE. However, the lack of appropriate supporting documentation was systemic for certain schools, causing significant concerns about school- or district-wide AYP determinations in the local report card.

Also, Ohio Rev. Code §3313.672 requires schools obtain specific records from new students during the admission process for enrollment. Refer to Section 12 of this report for lists of schools with systemic issues (i.e., scrubbing) and episodic errors pertaining to incomplete student attendance documentation.

As a matter of practice, based on the guidance included in ODE's 2011 EMIS Manual, Chapter 2, schools should not withdraw students for truancy, change of residency, or other reasons until receiving proof that the student has been determined to be truant by the court or is attending another school district. Additionally, during testing of enrollment for the 2010-11 school year, AOS identified many schools that purged student attendance records upon the student turning 18 years of age or within one year of graduating high school, which is contrary to the five-year student records retention period required by Ohio Rev. Code §3317.031.

Adequate Yearly Progress for Title I Schools

Title I, Sections 1116(a) and (b)(1), (7), and (8) of the ESEA (20 USC 6316(a) and (b)(1), (7), and (8)) and 34 CFR Sections 200.30 through 200.34 require school districts annually review the progress of each school served under Title I, Part A to determine whether the school has made AYP. Every school and district must meet AYP goals that the ODE Accountability Model (approved by USDOE) has established for reading and mathematics proficiency and test participation, attendance rate and graduation rate. AYP determinations for districts and schools are based on test participation and proficiency rate goals. These goals are evaluated for the student groups when the minimum subgroup size has been met. AYP graduation and attendance goals are evaluated for the "All Students" group only. Failure to meet any of the proficiency or participation goals, attendance levels or graduation targets results in the district or school not meeting AYP.

Title I, Sections 1111(h)(2) and 1116(a)(1)(C) of ESEA (20 USC 6311(h)(2) and 6316(a)(1)(C)) and 34 CFR Sections 200.36 through 200.38 also require each school district that receives Title I, Part A funds prepare and disseminate to all schools in the district—and to all parents of students attending those schools—an annual district-wide report card that, among other things, includes the number, names, and percentage of schools identified for school improvement and how long the schools have been so identified.

The State of Ohio and its schools are obligated under the NCLB Act to ensure information reported in their respective reports cards is accurate and complete. However, the lack of appropriate supporting documentation was systemic for certain schools, causing significant concerns about school- or district-wide AYP determinations in the local report card.

Refer to Section 12 of this report for lists of schools with systemic issues (i.e., scrubbing) and episodic errors pertaining to incomplete student attendance documentation.

10.2. RECOMMENDATIONS TO GENERAL ASSEMBLY AND OHIO DEPARTMENT OF EDUCATION

The results of our statewide assessment indicate that there are a number of areas requiring centralized, improved guidance and immediate clarification. AOS recommends the Ohio General Assembly and ODE use this report as a management tool to identify critical accountability systems and weaknesses requiring enhancement to aid Ohio schools in accountability determinations and reporting. The following is a comprehensive summary of the recommendations stemming from the statewide issues included in Section 10.1 of this report:

Kids Count Every Day

Ohio and federal law require daily attendance. Attendance – known as Average Daily Membership, or ADM – is used for two separate purposes in traditional public schools: 1). For the State foundation funding formula, and 2). For State and Federal accountability programs.

ADM for the school foundation funding purposes is not based on the entire year's attendance, but upon Count Week. Once a year, during one week in October, all the students across Ohio are counted. The outcome of this count is critical for local schools: absent children mean absent dollars for the rest of the year. As long as a child is present for that week, the money will flow all year long, even if the child does not return to school. This creates a perverse incentive to care very much about attendance during Count Week, and much less during the rest of the year.

On the other hand, ADM for the purpose of accountability metrics, including Adequate Yearly Progress, must be measured from the October Count Week all the way through the testing period (March or May). Complex rules and definitions that do not agree as between the two purposes create significant challenges for ODE.

Individual schools and districts have developed innovative – and often effective – ways to promote school attendance during Count Week. For example, in Columbus, the district sends phone and email messages to parents reminding them about the week, urging them to provide a valid excuse note for any child that is absent, since those children are still counted. Columbus has also run radio ads.

Some schools conduct drawings, ranging from \$25 gift cards for students with perfect attendance every day during Count Week to pizzas and movie tickets. Other schools schedule

The outcome of this count is critical for local schools: absent children mean absent dollars for the rest of the year.

spirit week for the same time, or have special days – e.g., “Pajama Day”. (Not all tools related to Count Week are good public policy. Still other schools allow greater flexibility on tardiness, or even put a moratorium on expulsions during Count Week.)

The AOS recommends basing State funding on year-long attendance numbers. That is, that the money follow the student in more or less real time. (Some sort of accounting structure allowing monthly or quarterly reconciliation may be necessary to even out the cash flow.)

This would spread out the financial incentives to continue the Count Week attendance initiatives all year long. More importantly, it would make scrubbing much more expensive.

If State funding is based on yearlong attendance, local schools will be much less willing to break a student’s enrollment to gain some incremental advantage by rolling up that student’s achievement test score to the State. The break in enrollment would mean a loss of money. Under the current system, there is no financial meaning to the break in enrollment – as long as the child was in school on Count Week, the later break in enrollment is consequence-free, and the dollars continue to roll in.

Finally, by having one ADM process that supports State foundation funding as well as State and Federal accountability functions, the risk of error due to the complex nature of the system is reduced, and the system itself would be easier to manage.

Increase Oversight of School Districts

As described earlier in this report, the AOS audit of attendance practices in Ohio’s schools began when results of an internal audit at Columbus City Schools revealed irregular attendance and enrollment practices and similar allegations surfaced at Toledo City Schools and Lockland City Schools. Throughout our examination, ODE worked cooperatively and diligently with AOS to provide the necessary information and documentation to support the AOS statewide examination and respond to questions. However, the widespread nature of irregularities and questionable attendance practices demonstrates a lack of oversight by ODE at the very least. To the extent that existing statutes contribute to an environment that makes ODE’s role unclear, or cumbersome, those statutes should be amended to reflect the need for a robust, State-level accountability function with the Ohio tradition of local school control.

AOS recommends ODE improve the independence of its accountability oversight measures. As part of this process, AOS suggests removing report card performance ratings information from the Secure Data Center, thereby reducing the opportunity to manipulate the outcome of report cards. For certain withdrawal codes in the Education Management Information System (EMIS), AOS recommends that ODE cross-check the timing of student withdrawals and enrollments. This more in-depth analysis limits the ability for schools to mistakenly misreport or intentionally “scrub” students without ODE inquiry.

Additionally, ODE’s statutorily-defined mission is to graduate all students well prepared for success. To that end, the State Board focuses on the following objectives:

- Teaching 21st century knowledge and skills for real-world success;
- Effectively delivering support for a high quality education;
- Providing sufficient resources which are efficiently managed; and
- Developing a statewide outreach and communication strategy on board policy and the importance of education in the 21st century.

Since ODE’s primary role is to assist schools, a separate, independent agency may be best suited to oversee and verify Ohio’s accountability system.

AOS recommends ODE improve the independence of its accountability oversight measures.

Furthermore, ODE relies heavily on the honor system, assuming that schools honestly report their attendance and other data in EMIS as required by law. ODE is handicapped by the limited timeframe, a period of approximately eight weeks altogether, it has to produce the local report cards. Expanding cross-checks and EMIS data monitoring throughout the school year would greatly enhance ODE's ability to identify and correct mistakes or detect fraud in EMIS reporting, but may require additional resources and re-tasking existing resources to accomplish.

The current system relies upon local schools and school districts - but these are the very entities that are interested in the outcome of the accountability measures. That is, the local school or district has a duty to ensure complete and accurate reporting, and a self-interest in making the reported data to appear in the best possible light - a classic conflict of interest.

AOS recommends the General Assembly reform the system by introducing independent oversight and verification.

AOS recommends the General Assembly reform the system by introducing independent oversight and verification. EMIS monitoring functions should be performed by an independent agency or commission appointed by the General Assembly. While such measures would require legislative change, empowering an outside commission or another State department to conduct accountability monitoring increases segregation of duties. Alternatively, the policy, licensing and accountability functions could be divided with another existing entity such as the Board of Regents.

Ideally, such monitoring efforts should be ongoing throughout the school year, or if not feasible, conducted in close proximity to the end of the academic year. ODE and the General Assembly should consider enacting penalties and taking corrective measures, such as temporary suspension of State Foundation funding or federal funding for noncompliant schools, until significant inaccuracies are fully corrected by noncompliant schools.

Monitor Programs for At-Risk Students

The State of Ohio Consolidated Application Accountability Workbook for State Grants under Title IX, Part C, Section 9302 of the Elementary and Secondary Education Act, amended and approved by USDOE on April 29, 2010, (the Accountability Workbook) prescribes the requirements for combining Ohio report card indicators, the performance index score, the growth calculation, and the federal AYP requirements to determine school and district designations.

As described in Ohio's Accountability Workbook, all public school students will be included in Ohio's accountability system and in the statewide AYP calculation. In cases in which the school or district that serves a student's attendance area has a say in deciding to educate the student in another institution (e.g., the school/district decided to place students with a particular disability in a school other than the student's school of residence), the student will be counted at his/her neighborhood school. In cases in which the school or district that serves a student's attendance area had no say in deciding to educate the student in another institution (e.g., students who are placed by a court [or by parent]), the student will be counted at the educating institution. Ohio has one statewide school district to account for all youth who are adjudicated for reasons of unruliness or delinquency (e.g., incarcerated youth and Department of Youth Services placement).

Ohio has developed a comprehensive set of Where Kids Count (WKC) business rules to ensure that each and every student is included in the accountability system and to guide schools and ODE in determining where each student counts. Additionally, ODE uses school and district Information Retrieval Numbers (IRNs) in the State's accountability system to identify the entity (if any) to which a student's attendance and other report card data should be at-

tributed based on strict Federal reporting guidelines. In some cases, schools use a unique IRN to separately account for its alternative school programs. In other cases, schools track students participating in alternative school programs within the resident school (i.e., no separate IRN). A school's use of a separate IRN number is dependent upon whether the alternative program meets ODE's business rules for establishment of a unique IRN number.

A board of education wishing to give special attention to school discipline and attendance issues is authorized under Ohio Rev. Code §3313.533 to establish alternative schools or programs within its respective districts. An alternative school or program under Ohio Rev. Code §3313.533 is not the same as a community school. An alternative school/program established per a plan under Ohio Rev. Code §3313.533 is subject to the authority of the same board of education that adopted the alternative school/program plan. To clarify, the alternative school remains part of the school district and is not a separate and distinct entity (even if operated by a nonprofit or for-profit entity under contract with the board). In addition, the superintendent of a school district is granted authority to assign students to district schools and programs (Ohio Rev. Code §3319.01). This is why parental consent is not required regarding the assignment of students to an alternative school.

In addition to alternative school programs, Ohio law currently provides for two types of community schools: the "conversion" school and the "new start-up" school. As defined in Ohio Rev. Code §3314.02(B) and §3314.10(A), a conversion school is a community school that is created "by converting all or part of an existing public school" to a community school. As further described in Ohio Rev. Code §3314.02(A)(5), a new start-up school is any community school which does not involve this process.

The students to be serviced by such schools or programs are defined by statute as, among other things, those students who are on suspension, who are having truancy problems, and who are experiencing academic failure. The primary emphasis in the establishment of alternative schools or programs is school discipline; however, the law also permits the creation of alternative schools specifically designed to address attendance problems or certain academic problems.

Under existing law, a board of education must establish alternative schools or programs in accordance with their adopted intervention plans, which include certain required elements. The government of alternative schools or programs is unremarkable in that such schools or programs are subject to the authority of the local board of education and no special provisions or exceptions are made with respect to their operation or compliance. It should also be noted that the law makes no provision for parental input or consent with respect to the assignment of students to an alternative school established under Ohio Rev. Code §3319.41. Thus, enrollment in such schools is not optional or voluntary for students. It is presumed, rather, that students are to be assigned to alternative schools by the superintendent pursuant to the general statutory authority to assign pupils under Ohio Rev. Code §3319.01, subject only to the criteria for admission set forth in the alternative school plan. Once admitted to an alternative school or program, a student is likewise presumed subject to reassignment if such reassignment is deemed appropriate by school officials.

As further described in Ohio Rev. Code §3302.03(C)(6), for any district that sponsors a community school (i.e., start-up schools and certain conversion schools) under Chapter 3314 of the Revised Code, ODE shall combine data regarding the academic performance of students enrolled in the community school with comparable data from the schools of the district for the purpose of calculating the performance of the district as a whole on the report card issued for the district under this Section or Section 3302.033 of the Revised Code. However,

division (C)(6) of this Section does not apply to *conversion* community schools that primarily enroll students between sixteen and twenty-two years of age who dropped out of high school or are at risk of dropping out of high school due to poor attendance, disciplinary problems, or suspensions.

Community schools are independent public schools, and are not governed by the traditional school district board of education. There are certain “drop-out recovery community schools,” which are community schools that focus on at-risk students with discipline or attendance issues. Again, this is entirely different from an alternative school or program.

In practice, there are few conversion schools in Ohio. Most community schools are start-up schools, for which the academic performance of enrolled students are rolled up into the sponsoring school district’s report card. Additionally, not all alternative programs are community schools. Many alternative programs are in-district sponsored programs for which student performance ratings should be counted by the District.

During the student attendance and accountability investigation, AOS noted school districts are generally uncertain about the guidelines for obtaining separate IRNs for alternative school programs, conversion schools, and start-up schools. Additionally, some schools may be incentivized to transfer low-performing, attending students to alternative conversion school programs by establishing a separate IRN to create a break in enrollment, scrubbing the school’s report card by rolling the students’ test scores to the district or State report card.

Currently, ODE approves new IRN numbers upon creation of the new program. Additionally, ODE approves certain conversion schools, but only upon a school district filing notice with ODE about the conversion school. Over time, as these programs evolve, the nature of the services rendered to student may change and no longer be appropriate for exclusion from a school’s report card for accountability purposes. ODE does not have policies or procedures in place for monitoring and periodically verifying the continued applicability of assigned IRN numbers or district transfers of students to alternative community school programs for reasonableness. As a result, irregularities and inconsistencies in the way schools track and report their attendance data for alternative programs may go undetected.

AOS recommends ODE regularly monitor assigned IRN numbers to ensure schools are still using their approved IRN’s for the originally-intended purpose. Additionally, AOS recommends the General Assembly provide express authority to ODE or another appropriate agency to monitor and independently verify at-risk student transfers to alternative school programs to ensure such transfers are made for valid legal reasons and the respective student performance ratings are reflected in the appropriate school or State’s report card. This will decrease the risk of scrubbing due to improper use of IRN numbers and at-risk student transfers to alternative programs and provide greater consistency in the accountability data among schools for students receiving interventions in lieu of expulsion or suspension.

Increase EMIS Training

Currently, Federal and State laws do not prescribe minimum continuing education requirements for school EMIS personnel. As part of the student attendance and accountability investigation, AOS had to learn firsthand the complexities associated with the Federal and State accountability rules and regulations. These requirements are further complicated by the Ohio school funding model, which is separate and distinct from Federal and State accountability provisions.

Accountability requires sound student attendance data collection and reporting. AOS recommends the General Assembly and ODE work cooperatively to develop minimum continuing professional education requirements for school EMIS personnel, administrative qualifications or skill-sets, and certification or licensure requirements for key EMIS personnel. The wide range of accountability and school funding activities school EMIS personnel perform today as compared to even just ten years ago is indicative of how their roles are changing, which makes ongoing professional education for school EMIS personnel more critical than ever. Providing base-line and continuing education to school EMIS personnel is critical to shoring up and ensuring the long-lasting integrity of Ohio's accountability system.

Providing base-line and continuing education to school EMIS personnel is critical to shoring up the integrity of Ohio's accountability system.

Increase Use of Automation to Protect Data and Process Integrity

Ohio does not require a uniform automated testing model to conduct its student assessment tests. While Ohio contracts with a vendor to calculate individual student assessment test scores, this contractor has the ability to subcontract test administration and scoring to other vendors. These vendors then provide the student assessment test scores directly to the schools, who manually input the scores ODE will use for accountability purposes into EMIS. While the vendors also provide a summary file of student test scores to ODE, ODE does not upload the student test scores directly into EMIS due to the probability of changes that will inevitably occur to student test scores for some schools. For example, some students will have an incorrect SSID number (*Refer to Section 10.2 of this report for AOS Statewide Student Identifier System recommendation regarding ODE access to personally identifiable student information*), students may take the assessment tests in an outside school district, and districts may wish to appeal student test scores with the vendor. Where student test scores are appealed and subsequently changed, the vendor does not provide ODE with an updated file of student test scores. ODE permitting the school districts to have access to student test score data and subsequently input said data into EMIS allows for errors and irregularities to occur and go undetected, particularly due to the time constraints on school officials to enter student assessment test scores in EMIS prior to the close of the fiscal year. While ODE's Office of Accountability performs some comparisons between the vendor test score file and the district-submitted test scores in EMIS for significant variances, there is a limited time of approximately only eight weeks within which the EMIS data is available in the Secure Data Warehouse can be modified.

To take the possibility of error or fraud out of the hands of the schools, AOS recommends the General Assembly consider enacting legislation and providing the necessary funding to implement an automated student performance assessment-based testing system in Ohio. An automated student assessment testing system allows test results to be reported back quickly, enabling information about progress toward college and career readiness to be included on report cards on a more timely and consistent basis with significantly less risk for error or omission. Additionally, school personnel should not administer tests or have access to the raw test score data received from the vendor to decrease the risk of errors or irregularities in student assessment test scores reported to ODE and subsequently calculated in the school, district, and State report cards.

As part of this initiative, the General Assembly should consider a needs-assessment study to appropriately finance this investment and ensure a reasonable implementation period that considers the needs of all users, which may require certain steps to be phased in over time. AOS further recommends the General Assembly require test administration by independent proctors and that vendors submit student assessment scores directly to ODE throughout the year to be used for the calculation of AYP and the local report card.

State Monitoring of Student Withdrawals

Currently, ODE's Department of Accountability performs high-level reviews of school enrollment information at year end, looking for obvious anomalies based upon ODE's experience and knowledge of the individual schools. ODE analyzes school enrollment data for significant changes in student assessment scores, ranking, mobility, and categorization of students in sub-categories as required by NCLB. Based upon the ODE EMIS report submission timeframes outlined in the FY 2011 EMIS Manual, the timeframe for ODE to conduct these reviews is limited based upon availability of school data, allowing only an eight-week window within which ODE can perform analyses. This timeframe has been shortened over the past few years due to ODE sending EMIS report card data to an out-of-state vendor to perform the complex calculation for the value-added component of the report card.

However, ODE collects a vast amount of information through their EMIS system that could be utilized to increase and streamline accountability monitoring efforts and place more reliance upon the information that schools submit to ODE in EMIS. Currently, schools report enrollment information to ODE in EMIS in a silo fashion. School district A cannot see the enrollment information school district B submits to ODE or vice versa. Only ODE can combine EMIS data submitted by multiple schools to trace the history of student mobility. To improve the effectiveness and frequency of ODE monitoring efforts, AOS recommends ODE generate statewide school reports by SSID number for key enrollment and withdraw codes. ODE should utilize these reports to perform analyses and cross-check the timing of student withdraws and subsequent enrollments against EMIS data reported by individual schools for completeness and accuracy. While unexplained gaps in attendance will likely still occur on occasion for particular SSID's, this type of random and frequent monitoring would limit the ability for schools to misreport or intentionally "scrub" students without ODE inquiry and investigation. The following are just a few of the withdrawal codes for which ODE could assemble reports from EMIS for analysis:

1. *Code 41 Withdraws, Transfers to Another Ohio School District:*

As described in the introduction of this report, all schools must generate an SSID number for each attending student upon entrance into Ohio's school system (e.g., pre-school students, students moving into Ohio for the first time, etc.). AOS recommends ODE generate a SSID history report for students that schools withdrew under code 41, as having transferred to another Ohio school district. This report should include all significant attendance transactions for each SSID that were rolled up to the State based upon a break in the FAY or a change in the majority of attendance IRN assignment as entered in EMIS by schools. If a student was withdrawn, the next transaction in the SSID History report for the same SSID number should list the new school IRN where the student subsequently transferred. If a new school IRN is not listed in the SSID History report, this could be an indication of scrubbing that ODE should further investigate.

While admittedly not foolproof, this type of report analysis will allow ODE to perform more effective monitoring over code 41 withdraws and limit schools' ability to misreport or scrub attendance data. Furthermore, ODE can use this report to monitor school assignments of new SSID codes to prevent multiple SSID's from being assigned to the same student among several school districts.

2. *Code 43 Withdraws, Transfers to Home Schooling:*

Ohio law requires students being educated by local school districts that wish to be homeschooled must obtain prior approval from their local education service cen-

ter (ESC). Conversely, students being educated by city and village exempt school districts only require the school district's Superintendent approval for homeschooling. To strengthen and foster consistency in the reporting of approved homeschooling, AOS recommends the General Assembly consider amending the authorities and powers of ESC's to approve homeschooling for all Ohio school districts, including city and exempt village districts. This would create a reliable third-party resource for ODE to confirm approval of homeschooled students as reported in EMIS using code 43.

3. *Code 45 Withdraws, Court-Placed Students:*

Some students are sent to the State report card based on court placement; code 45, to remove a student from their residential district to another district for a specific program; special education needs, foster placement, or assignment to a juvenile detention center. AOS recommends the General Assembly provide authority for ODE to collect personally identifiable information, such as student names, to enable ODE to work cooperatively with the Ohio Juvenile Court system and DYS tracking and reporting truant students. This type of interagency integration would foster a strong third-party verification of court-placed withdraws in the EMIS system, significantly restricting schools' ability to inaccurately report or scrub student attendance data using code 45.

4. *Code 48 Withdraws, Expelled Students:*

ODE requires schools submit disciplinary information to ODE when a student is expelled or suspended, which is maintained in ODE's general discipline database. ODE can generate a report of all students reported as being withdrawn under EMIS code 48 due to expulsion. Then, ODE can compare the EMIS code 48 expelled students to those students included in the general discipline database. Theoretically, students withdrawn due to expulsion but with no disciplinary record on file at ODE could indicate scrubbing that ODE should further investigate.

5. *Code 71 Withdraws, Truancy:*

To provide for due process, students that are habitually truant, reported as code 71, should be declared so by the court prior to schools withdrawing students from enrollment. Based on this, the Juvenile Court system and Ohio Department of Youth Services (DYS) possess records sufficient to confirm a student's court placement. However, since the courts do not have the SSID numbers for students (only student names) and ODE does not have student names (only SSID numbers), there is currently no way for ODE to cross-check court-placed students with these other State agencies. AOS recommends the General Assembly provide authority for ODE to collect personally identifiable information, such as student names, to enable ODE to work cooperatively with the Ohio Juvenile Court system and DYS tracking and reporting truant students. This type of interagency integration would foster a strong third-party verification of court-placed withdraws in the EMIS system, significantly restricting schools' ability to inaccurately report or scrub student attendance data using code 71.

6. *Code 73 Withdraws, Over 18 Years of Age:*

School districts can withdraw students at their discretion as soon as the student turns 18 years old, at which point the Compulsory Education Act no longer applies. Since this withdrawal is based solely on student standing data, ODE could generate an EMIS report of student standing data, including birthdates, and compare this report to students withdrawn under code 73 in EMIS to ensure the student was indeed 18 years of age at the time of withdrawal.

7. *Other Withdraws*

ODE should consider whether additional EMIS report comparisons could be made using significant withdraw or enrollment codes. Also, ODE should consider requiring schools to submit other information to ODE to support withdraws, changes to WKC, changes to the majority of attendance IRN numbers, and other data relevant to the report card. ODE collection of additional supporting documentation could be used to compare to the respective EMIS withdraw codes for completeness and accuracy.

Statewide Student Identifier System

The General Assembly should change existing law to allow the ODE to have access to names of students and other personal information with necessary privacy protections consistent with Federal law. This statutory constraint imposes significant costs on both ODE and on users of the Statewide Student Identifier (SSID) system without providing additional privacy protections beyond those required by Federal law. Only two states have been identified that operate under such restriction. This recommendation was given in an interim report of the performance audit of ODE issued October 8, 2012. The finding and recommendation was further supported during the review of attendance data. This system was an impediment to our auditors and should be removed to allow ODE to have access to student names and necessary information, with privacy protections.

Establish Separate Tracking for Community School Withdrawals

Chapter 2 of the FY 2011 ODE EMIS Manual outlines the various withdraw codes traditional and community schools must use to withdraw students for accountability purposes. However community schools are unique. Ohio Rev. Code §3314.03 requires that the contract entered into between a sponsor and the governing authority of a community school include, among other things, a provision that the governing authority will adopt an attendance policy that includes a procedure for automatically withdrawing a student from the community school if the student, without a legitimate excuse, fails to participate in 105 consecutive hours of the learning opportunities offered to the student for State funding purposes. Currently, the ODE EMIS Manual does not distinguish between community school truancy withdraws for State funding and Federal accountability purposes. As a result, community schools are forced to use EMIS withdraw code 71 for all withdraws related to truancy even though it does not comply with the statutory definition of truancy used for Federal accountability. However, the timing of the 105-hour rule withdraws does not correlate to the statutory accountability truancy definitions. Additionally, truancy withdraws made for State funding purposes do not provide for adequate due process prior to withdrawal. As a result, community school EMIS code 71 truancy withdraws for State funding are likely to result in misstatements in the report card due to students not meeting the legal definition of being truant for accountability purposes and not receiving due process prior to withdrawal.

AOS recommends ODE create a separate and distinct withdrawal code in EMIS for community schools to use for the State's 105-hour rule truancy withdraws for funding purposes to prevent such withdraws from inaccurately impacting the report card.

Protect Report Card Results from Security Vulnerabilities

ODE uses the Secure Data Center (SDC) to verify information submitted by school districts in EMIS. ODE returns edit checks on the report card data submissions to school districts weekly during the close out period. This includes all fields required in Chapter 5 of the EMIS Manual; however, these edit reports also indicate the projected performance rating status at the school and district wide levels for the local report card.

While the concept of the SDC was to correct or verify EMIS information, allowing school districts to realize the projected report card ratings prior to the finalization of EMIS data and close of the submission period gives the school districts the opportunity to intentionally “scrub” or change report card data to improve the outcome of the final report card rating.

AOS recommends ODE remove the report card performance rating information from the SDC, allowing school districts to verify only the EMIS data submissions without projected rankings. This will reduce schools’ ability to change the outcome of their local report card.

Centralize Accountability Resources

ODE maintains several accountability resources in various locations on its website for school districts to use in reporting student attendance, enrollment, and other important report card factors. However, there is no centralized index that helps connect these resources and provide clarity. ODE should develop a centralized location on its website to provide clear instruction on accountability requirements and how they relate to EMIS reporting.

Statewide Student Information System

Most Student Information Systems (SIS) that are utilized by school districts have an “Audit Log Capability” to capture all changes made to the standing data in the SIS system; however, these audit logs are not always turned on by the schools. Also, given the complexities of accountability rules and the EMIS system, the large number of student information system vendors and lack of prescribed minimum SIS requirements creates difficulty reviewing reporting and collecting student enrollment information in a consistent and timely fashion. The General Assembly and ODE should work cooperatively to establish a single statewide student information system so that all data is uniform, uniformly reported, and accessible for data mining within Federal guidelines. Alternatively if such is not feasible, the AOS recommends ODE adopt minimum standard requirements for SIS used by school districts in the State to ensure the EMIS portion of the SIS meets specified State requirements. As part of this process, ODE should also ensure all approved SIS vendors have appropriately defined EMIS data fields to ensure consistent and accurate reporting of EMIS attendance data.

Document Student Withdraws

State statute and ODE’s EMIS Manual provide limited guidance to school districts on the evidentiary documentation required to support student withdrawals. Unless required by Board-adopted policy, there is no statutory requirement to complete a “withdrawal form.” However, most of the time, a public record triggers the withdrawal of a student. For example, a parent might write a letter to the school to notify the school that the student will be moving and transferring to a new school. This written letter becomes a public record upon receipt by the school district and therefore should be maintained (electronically or otherwise) for at least five years in accordance with Ohio Rev. Code §3317.031.

AOS recommends ODE clarify its EMIS Manual and administrative rules to require (and not merely suggest) what types of evidentiary documentation must be maintained for each of the EMIS withdraw codes described in Chapter 2 of ODE's EMIS Manual.

Below is a list of potential records ODE might reasonably expect a school district to obtain and maintain to support certain withdraw codes:

AOS recommends ODE clarify its EMIS Manual and administrative rules to require (and not merely suggest) what types of evidentiary documentation must be maintained.

- *Code 71, Truancy Withdraws* - State statutes provide several procedural steps which school attendance officers (appointed by the school board) must follow in dealing with violations of the compulsory attendance laws. Ohio Rev. Code §3321.19 and 3321.20 require attendance officers to give prior warning of the legal consequences of truancy to the parent or guardian of the truant child. When any child of compulsory school age is not attending school and is not properly excused from attendance, the attendance officer must notify the parent or guardian who must thereafter cause the child to attend the proper school (Ohio Rev. Code §3321.19).
 - ODE should require school districts to conduct and document the due process described above **prior to** withdrawal of students due to Truancy. Additionally, ODE should require school attendance records document the requisite number of absences to demonstrate truancy under the definitions prescribed by State statutes.
- *Code 51, Verified Medical Withdraw* - Require schools to maintain a doctor's authorization on file.
- *Codes 40 through 43, Transfers*- Require schools to obtain a transcript request, superintendent's approval, notice from a parent or guardian, etc. prior to withdrawal of a student for transferring to another Ohio school district, out of state, a private school, or home schooling.
- *Code 45, Transferred by Court Order/Adjudication* – Even if a Court has designated another public district as the district responsible for paying for the education, the resident district should not withdraw ANY students placed into the Department of Youth Services. ODE should consider what documentation should be maintained by schools to evidence court-placement.
- *Code 73, Over 18 Years of Age* - The Compulsory Education Act no longer applies to students who are 18 years and older. ODE should provide guidance to schools in the EMIS Manual regarding the appropriate documentation to support age requirements.
- *Code 48, Expelled* - ORC §3313.66 requires schools to notify parents of the intent to suspend or expel, describing the reasons for the suspension and providing an opportunity for an informal hearing. These notices should be kept on file to support withdraws. Additionally, schools should maintain copies of the supporting disciplinary reports submitted in EMIS for each disciplinary action taken against the student.

The supporting documentation described for the withdrawal codes above are merely examples. ODE should consider whether these examples are appropriate and provide clarity to schools about required evidentiary documentation to support withdraw codes in its EMIS Manual and administrative rules.

Withdrawal of Foreign Exchange Students

Currently, ODE's WKC Business Rules and EMIS Manual provide no guidance to school districts on the withdrawal of foreign exchange students who take a leave of absence from the

school to visit their home country. During the student attendance and accountability testing, AOS observed inconsistent treatment among schools of foreign exchange students.

We are in a global economy with significant international presence. As such, there is a growing foreign student population among Ohio schools. However, ODE's EMIS and WKC guidance has not evolved timely to address accountability concerns related to the attendance and withdrawal of foreign exchange students temporarily returning to their home countries. For example, some schools withdrew foreign exchange students after only one or two weeks of non-attendance due to temporarily visiting their home country. These schools then re-enrolled the foreign exchange students upon returning to the school.

The practice of withdrawing and subsequently re-enrolling foreign exchange students for temporary absences creates breaks in enrollment, which cause these students to be rolled up to the State report card. However, due to the lack of ODE guidance in this matter, it is unclear whether a break in enrollment was appropriate in these circumstances. AOS recommends ODE revise its Accountability Workbook and WKC Business Rules to provide clarity on enrollment issues pertaining to foreign exchange students.

10.3. SCHOOLS WITH EVIDENCE OF SCRUBBING

Scrubbing Indicators

For the purposes of this report, scrubbing is the practice of removing students from enrollment without lawful reason, regardless of the purported motivation. The term "scrubbing" does not necessarily imply malicious intent. Based on testing performed, nine school districts employed questionable attendance policies and practices which AOS believes is an indication that these schools were at a higher risk for scrubbing attendance data to improve their local report cards. As further described below, these schools withdrew students based on a pattern of absences, which could have been influenced by lower test scores, without truancy adjudication. In some cases, AOS was able to obtain SIS transaction modification data to determine the exact date on which schools withdrew students, noting certain instances of retroactive withdrawals.

10.3.1. COLUMBUS CITY SCHOOL DISTRICT

As described earlier in this report, the AOS was contacted by the Columbus CSD's Superintendent about the possibility of district officials retroactively withdrawing students. The AOS met with the Internal Auditor (IA), at which time the IA presented a report indicating approximately 10,000 withdrawn students with retroactive SIS transaction modification dates in May or June 2011. However, the withdrawal dates schools entered for these students fell within the "120 days" (i.e., between the official October count week and dates on which the students took their assessment tests). The IA department selected a sample from these students to investigate. Based upon the IA's review, 81 out of 82 student files examined had no documentation to support the EMIS withdraw code reason used by school officials. Furthermore, the IA informed the AOS of the procedures the school district used to determine which students were to be withdrawn at each school. The IA issued its own Special Review Report titled, *Student Altered Attendance Records Review for the School Year 2010-2011* on December 20, 2012 describing the IA's testing results.

AOS Identified Nine Districts as Scrubbing

Canton City SD

Campbell City SD

Cincinnati City SD

Cleveland Municipal City SD

Columbus City SD

Marion City SD

Northridge Local SD
(Montgomery County)

Toledo City SD

Winton Woods City SD

There is a separate, ongoing Special Audit being performed for Columbus CSD by the AOS, the results of which will be reported separately upon its completion.

10.3.2. TOLEDO CITY SCHOOL DISTRICT

After news reports that Columbus CSD altered student attendance data, Toledo CSD publicly announced they too scrubbed attendance data. Toledo CSD officials indicated they understood these practices (i.e., removing students with a high number of absences) to be allowable. AOS met with representatives of Toledo at which time Toledo CSD explained its practice of removing students with five consecutive days of unexcused absences and a total of 20 unexcused absences throughout the school year. Toledo CSD has been using the “5/20” rule for withdrawing students since 2001. However, until 2005, Toledo CSD actively removed these students throughout the school year. In 2005, Toledo CSD lost several high-level administrators to Cleveland MCSD. Toledo CSD subsequently hired new administrators and in 2006 the local report card ratings fell since the “5/20” rule for withdrawing students was no longer in place. After realizing lower report card rankings, Toledo CSD administrators decided to reinstitute the “5/20” rule for withdrawing students in the following school year. However, instead of withdrawing students throughout the school year, Toledo CSD waited until after they received the first report from the Secure Data Center from ODE during the reporting period projecting the district’s report card rankings. Toledo CSD informed AOS that they removed all students that met the 5/20 criteria, regardless of assessment test score results for the affected students.

AOS reviewed a total of nine schools in Toledo City School District, completing testing procedures over a total of 884 students. Based on this review, AOS noted 470 instances in which students were withdrawn due to truancy/nonattendance under code 71 without proper due process, including parental notification and court adjudication. Of these 470 instances, 417 also did not appear to meet the 5/20 rule. Additionally, AOS noted 143 other exceptions related to lack of appropriate support for the noted attendance event, including 78 students for which no files could be provided by the District. Of the 616 total exceptions noted, 488 were related to students who had scores below 400 on at least one section of the statewide Ohio Achievement Assessments or Ohio Graduation Tests.

See Section 12.1 of this report for a list of Toledo CSD schools with a systemic lack of student attendance supporting documentation.

10.3.3. CLEVELAND MUNICIPAL CITY SCHOOL DISTRICT

ODE provided the AOS with a list showing the State roll up of students, percentage of roll up students, tested State roll up students, and percentage of tested roll up students for each district throughout the State. Cleveland Municipal City School District (MCSD) was top on this list for the 2010-2011 school year. Our review at Cleveland MCSD showed the following:

- Of the students rolled up to the State as described above, AOS initially provided Cleveland MCSD a list of approximately 3,700 students from 15 schools for review. Cleveland MCSD officials indicated due to the number of files requested and the mobility of students, the files could not be completely gathered for review from the 15 schools included on the initial request. Cleveland MCSD officials determined the requested files were located at 109 different schools within the district. As such, this prolonged

the gathering of these files and the 3,700 files were not gathered in their entirety at the time of the first interim report.

- At the time of the first interim report, AOS was able to conduct a limited review of certain files at three Cleveland MCSD schools: Walton Elementary School, Collinwood High School, and Lincoln West High School. There was insufficient documentation in all 48 files reviewed at Walton Elementary School, in all 12 files reviewed at Collinwood High School, and all six files reviewed at Lincoln West High School. Additionally, AOS called three additional Cleveland MCSD schools, John Adams High School, Glenville High School, and Buckeye-Woodland Elementary School, noting such supporting documentation was also not included within student files at these schools. AOS also noted Cleveland MCSD does not have a policy regarding completion and maintenance of enrollment or withdrawal forms. Once information is entered into the electronic SIS system, district policy does not require schools to maintain any specific forms signed by parents or guardians or to maintain any other documentation received from or sent to other school districts.
- Pursuant to the previously-described selection methods as part of AOS' Phase Three review, additional Cleveland MCSD schools were part of this final selection. However, prior to attempting to gather supportive information from these additional schools, the initial selection of approximately 3,700 students was significantly reduced to a condensed list of 210 students to determine availability of records and the cost benefit of providing a list of additional students for review to Cleveland MCSD or to pursue the remaining balance of the 3,700 student initial selection.
- A review of information provided by Cleveland MCSD for these 210 students identified the following:
 - 127 – Students for which no supportive documentation was located and provided by Cleveland MCSD to support the cause of the student's results being rolled up to the State;
 - 31 – Students for which documentation was provided; however, the documentation provided was not relevant and/or insufficient to support the student's attendance event. For instance, these documents included information related to fiscal year 2012, printouts from the SIS system, driver's licenses, lease agreements, or other information that did not appropriately support the noted attendance event for fiscal year 2011;
 - 16 – Students for which Cleveland MCSD was able to provide printouts from the SOES system for community schools. These printouts provide information that the student was enrolled elsewhere at an area community school for at least a portion of fiscal year 2011. Although no withdrawal or enrollment information was provided with these files for these students, the SOES information does support the fact that the student would be properly rolled up to the State;
 - 9 – Students that were part of the Downtown Education Center. For these students, information was provided by Cleveland MCSD from the Downtown Education Center's stand-alone computer system. This information is comprised of a print screen denoting the school district the student transferred from and date of transfer. These students represent students that were court-placed into the Downtown Education Center and are educated

by Cleveland MCSD. These students are properly rolled up to the State as they are court-placed;

- 27 – Students for which other sufficient supportive evidence was provided to appropriately support the student’s attendance event (i.e. parent/guardian signed withdrawal or enrollment forms, requests for records, transfer/withdrawal clearance forms signed by each teacher, notice of expulsion, court documentation for court-placement, etc.);
- On December 7, 2012, a subpoena was issued to Cleveland MCSD in an attempt to obtain complete supportive evidence for the noted attendance events for the entire list of the 210 students previously provided. No additional information was made available by Cleveland MCSD as a result of this subpoena.
- Based on the results of these 210 students and previous attempts to gather appropriate supporting documentation, AOS determined that for the majority of student files selected for review Cleveland MCSD could not be audited pursuant to the established statewide procedures due to the lack of supporting documentation maintained. Therefore, AOS did not attempt to gather additional supportive evidence from any of the remaining schools that were part of the phase three selection. Additionally, AOS made no further attempts to gather supportive evidence for the remaining approximately 3,500 students from the initial selection as the expected results would be similar to the results of the review for the condensed list of the 210 students;
- Regarding truanancies for the 2010-2011 school year, through interviews with Cleveland MCSD personnel, AOS noted Cleveland MCSD withdrew students under EMIS withdraw code 71 during the 2010-2011 school year if the students had five or more consecutive unexcused absences. Cleveland MCSD officials indicated they did not refer these students to the court system. Additionally, the withdrawal of these students occurred both during the year and at the end of the year. Cleveland MCSD officials also stated this procedure was applied uniformly to all students meeting the threshold of five or more unexcused absences during the 2010-2011 school year regardless of test results. As part of the previously-described review of the 210 students, AOS was also provided with a document showing a list of 9 students that were coded as 71 withdrawals and were submitted to the BMV for licenses to be suspended. It was noted that this information was generated by Cleveland MCSD’s IT department through data comparisons to determine if any of the 210 students were students who had their licenses suspended. It was also reiterated that the suspension of licenses through the BMV was part of the District’s policy. These students were not referred to the juvenile court either prior to, or at the time of, the truancy determination and corresponding code 71 withdrawal.
- Based on the information gathered, it appears Cleveland MCSD removed students under code 71 without full completion and documentation of appropriate truancy due process. Additionally, for the majority of students selected for review, Cleveland MCSD did not maintain appropriate supportive evidence regarding attendance events or other circumstances causing student results to be rolled up to the State.

See Section **12.1** of this report for a list of Cleveland MCSD schools with a systemic lack of student attendance supporting documentation.

10.3.4. CINCINNATI CITY SCHOOL DISTRICT

During our phase one testing, AOS noted a pattern of students transferring from one school to another within the Cincinnati City School District (CPS). However, CPS coded these school-to-school transfers as withdrawals in the EMIS system, resulting in breaks in enrollment and these students' performance assessment test scores being rolled up to the State report card. School to school transfers within the same district, while not included in the school-level report card, should be reflected in the district-wide report card and not rolled up to the State. Based upon the pattern of transfers and withdrawals, the AOS requested a meeting with CPS officials to inquire about the reason for these transfers and why the district created breaks in enrollment for these students. District officials explained that they withdraw a student when the student's parent or guardian indicates the student will be transferring to another school within the school district. However, CPS enters a withdrawal date but does not enter a withdraw code or reason in their student information system (SIS) for these transfers. Upon the student attending the new school, the district then re-enrolls the student in the SIS within the new school. At the end of the school year, the district then generates an SIS "Extract" report to list all students with a withdrawal date but no withdraw code. District officials then review the extract report and calculates the number of days between the day the district was informed the student was leaving, withdraw date, and the day the student attends the new school in the district (i.e., the re-enrollment date). If the student did not attend the new school on the subsequent school day following the requested the transfer, the district enters a code 41 withdrawal (i.e., Transfer to another Ohio District) in the SIS for students that had five or less days lapse between the withdraw date and re-enrollment date. Additionally, the district enters a code 74 withdrawal (i.e., whereabouts unknown) for students that had greater than five days lapse between the withdrawal and re-enrollment date. This practice creates a "break" in enrollment and rolls the student to the State report card. AOS inquired whether CPS officials were aware this practice contravened ODE's business rules for school-to-school transfers. CPS officials informed the AOS that they knew they were in noncompliance; however, CPS officials indicated they did not agree with ODE's business rules in regards to intra-district transfers. CPS officials believe a break in enrollment is justified if the student fails to immediately attend the new school on the day of transfer.

AOS reviewed schools from CPS during each phase of our student attendance and accountability examination (i.e., five schools in phase one and one school each in phases two and three). During this testing we reviewed a total of 369 student attendance files, noting a lack of supporting documentation and withdrawal errors for 146 students. The majority of the errors, 98 students, appear to be a result of the CPS practice of breaking enrollment for intra-district transfers. The remaining errors were due to the following: lack of court order to support withdrawals due to truancy, missing student attendance files at time of testing, lack of support to justify breaks in attendance, wrong EMIS withdraw codes assigned based on available supporting documentation, and one student with multiple SSID numbers.

See Section 12.1 of this report for a list of CPS schools with a systemic lack of student attendance supporting documentation.

10.3.5. MARION CITY SCHOOL DISTRICT

During the course of testing, AOS noted numerous instances of students being transferred, sometimes automatically, to the Marion Digital Academy during the 2010-11 school year. As

such, these students were included on the list of those students being rolled up to the State and excluded from District report card results.

In many of these cases, the student file included a letter indicating the following:

"{Student} has missed four (4) days of school this quarter, which violates our attendance policy. {Student} has lost all high school credit for the current quarter of the 2010-2011 school year.

Due to nonattendance and the loss of credit for the quarter, we are enrolling {Student} in a credit recovery program through Marion City Digital Academy. While home computers will not be provided, Marion City Digital Academy will provide computer access at Harding High School from 12:00-2:30, in rooms 126 and 127. Students are responsible for transportation to Harding High School and will not be permitted in other areas of the Harding High School Campus.

We wish {Student} the best of luck in all future endeavors. If you have any questions concerning this notice or {Student's} attendance please contact the Marion Digital Academy."

The student was then withdrawn from Marion CSD and enrolled in the conversion school, Marion City Digital Academy. AOS determined this practice was only in place during the 2010-2011 and the District informed AOS verbally that it has since deemed this intervention unsuccessful and eliminated it.

AOS identified 46 students transferring to Marion City Digital Academy during the 2010-2011 school year with no parent or guardian initiation or approval included in Marion CSD's student files. AOS performed an additional review for 10 of these students at the Marion Digital Academy, noting the files for 7 of these 10 students, did not include any additional parental/guardian documentation.

See Section **12.1** of this report for a list of Marion CSD schools with a systemic lack of student attendance supporting documentation.

10.3.6. CAMPBELL CITY SCHOOL DISTRICT

AOS examined Memorial High and Campbell Middle Schools at Campbell CSD (Mahoning County), initially identifying 11 (High School) and 29 (Middle School) students, respectively, that did not have supporting documentation available in the student files to support breaks in enrollment related to the documented withdrawal reasons, including Homeschool, Expulsion, Truancy, and Verified Medical.

AOS obtained permission from the Superintendent to obtain student data from the District's Information Technology Center (ITC) to further investigate the nature and timing of these exceptions. Upon receiving the ITC report, AOS found that student withdrawals were made retroactively, during the months of May and June 2011.

AOS continued the review of these retroactive withdrawals and exceptions, including meetings with District officials on October 23, 2012 and November 1, 2012. As part of meeting with the District, the EMIS Coordinator provided additional documentation in an attempt to support the reasons for student withdrawals causing student results to be rolled up to the State. AOS reviewed this additional information and identified 11 (High School) and 28 (Middle School) students, respectively, that did not have sufficient supporting documentation to support the noted withdrawal reasons. Additionally, each of these 39 student withdrawals were noted to have retroactive modification dates made during the months of May and June 2011.

In the cases of students withdrawn under code 43 for homeschooling, the District maintains a separate folder with documentation on students being homeschooled and ESC approval. However, for the students noted as exceptions, no such documentation was available from the District supporting the fact that these students were homeschooled.

In the cases of students withdrawn under code 48 for expulsion, the Superintendent maintains a list and expulsion information for all expelled students. However, for the students noted as exceptions, there was no such information available for these students supporting the fact that an actual expulsion had occurred.

In the cases of students withdrawn under code 71 for truancy/non-attendance, no documentation was provided by the EMIS Coordinator or other District officials to support the fact that the students received proper due process or court adjudication for the code 71 withdrawal.

In the cases of students withdrawn under code 51 for verified medical reasons, the EMIS Coordinator or other District officials could not provide sufficient information to support verification of a code 51 withdrawal for medical. In many of these instances, the EMIS Coordinator provided e-mails indicating student illnesses including asthma, recurring coughs, etc. However, no further information was provided supporting withdrawal of the student for medical reasons. Additionally, through inquiry with District officials, AOS noted other students with medical issues causing inability of physical attendance at school receive home instruction from the District. There was no explanation provided as to why these students noted as exceptions would have been handled differently by the District, including withdrawal and re-enrollment.

See Section 12.1 of this report for a list of Campbell CSD schools with a systemic lack of student attendance supporting documentation.

10.3.7. CANTON CITY SCHOOL DISTRICT

Community Education Services IRN

State and federal laws increasingly emphasize accountability at the school level and the need to track student progress over time. To meet those goals, ODE has changed the meaning of the word “school” as it pertains to an IRN assignment. Instead of thinking of a “school” as a physical plant with a specific name and location/address, ODE’s policy is to define a “school” as a conceptual student body headed by an administrator dedicated to that group of students.

There are several reasons why a school or district may need IRN guidance including:

- Cases where a large increase or decrease in student population causes a district to make changes to the number of schools it operates;
- When a new community school opens or an existing community school amends its charter and reconfigures its operation into two or more schools;
- When a district is updating its facilities due to participation in the Ohio School Facilities Commission’s Classroom Facilities Assistance Program (CFAP);
- Situations where a district reconfigures its schools as part of the Corrective Action and/or Restructuring requirements of the No Child Left Behind Act.

ODE approved Canton CSD’s Community Education Services IRN to be used for the district’s adult education night school program. Adult education students should not be counted in the school, district-wide, or State report cards. Therefore, night school students should be

excluded from student attendance counts reported to ODE in EMIS. Yet, the district improperly included four adult education night school students to the State's report card during the 2010-11 school year.

Contrary to the purpose for which ODE approved the Community Education Services IRN, the district also uses this IRN for its Passages High School alternative education program. Passages High School was established in 1996 as a county collaborative alternative program for students who have been expelled or facing expulsion from his or her home high school. The program accepts students in grades 9-12 from Canton City Schools, North Canton City Schools, Jackson Local Schools, Lake Local Schools, and Plain Local Schools. The students must be referred by their home school administrator. However, while Canton CSD provided a copy of an agreement with the participating school districts' labor union, there were no written agreements explaining the terms and conditions for the Passages program between Canton CSD and the participating school districts themselves.

The majority of Passages students are at-risk 10th graders that only attend Passages one or two months and then return to their resident district. During the 2010-11 school year, the Canton CSD included seven Passages students to the State report card for attending the Passages program less than the full academic year. Likewise, each of the participating resident school districts break attendance and include students they have referred to the Passages program to the State report card for attending less than the full academic year if those students were referred to the Passages program after the October count week.

The district should not account for its Passages program in the same IRN as the adult education night school for several reasons. First, ODE did not approve the Community Education Services IRN to be used for the Passages program. Second, accounting for both programs within the same IRN creates errors in the local and State report cards since the night school should be excluded from report card accountability. Lastly, the Passage program is an alternative program and does not meet the Federal and State requirements for a separate IRN. Rather, students attending the Passages alternative program should continue to be counted for report card purposes by their resident schools, eliminating breaks in the full academic year for transferring to and from the Passages program.

Choices Program

Ohio Rev. Code §3317.03 (E) requires a school district to accurately show, for each day the school is in session, the actual membership enrolled in regular day classes.

Choices High School was established in 2000 as a county collaborative alternative program for students who were not successful in their home schools and had earned very few high school credits. The program accepts students from Canton City Schools, North Canton City Schools, Jackson Local Schools, Lake Local Schools, and Plain Local Schools. Students must be at least 16 years old and must be referred by their high school principals or counselors. Students that are 18 years of age can enroll themselves in the program. A referral packet must be completed by the referring home school.

During our testing of the 2010-11 school year, we noted 29 out of 162 Choices students had no documentation to support placement in or withdrawal from the Choices program. Additionally, contrary to Ohio Rev. Code §3317.03(E), the District does not maintain daily attendance records for any of its Choices students.

The district uses EMIS Code 71 (withdraw due to truancy/nonattendance) within its student information system to withdrawal students that have stopped attending the Choices program. However, ODE rejects these withdraws during the data transfer into EMIS since there are no

daily attendance records to support truancy or nonattendance. When this occurs, the district changes the withdraw code to EMIS code 74 (i.e., moved and not known to be continuing) and resubmits the withdrawal to ODE in EMIS to make a successful submission. Incorrectly reporting student withdrawals due to truancy and nonattendance misstates the district's report card.

See Section 12.1 of this report for a list of Canton CSD schools with a systemic lack of student attendance supporting documentation.

10.3.8. NORTHRIDGE LOCAL SCHOOL DISTRICT

AOS tested Esther Dennis Middle School and Northridge High School, identifying 16 Middle School and 43 High School students (59 total exceptions), that did not have supporting documentation available in the student files to support breaks in enrollment related to late admission or withdrawal reason codes, including Transfer to Another School District Outside of Ohio, Transferred to Another Ohio School District, Homeschool, Expulsion, Truancy, and Moved (not known to be continuing).

19 of the 43 High School students, had withdrawal forms on file that had notes to re-enroll students at a later date.

AOS obtained permission from the Superintendent to obtain student data from the District's Information Technology Center (ITC) to further investigate the nature and timing of these exceptions. Upon receiving the ITC report, AOS found that modifications were made retroactively, during the months of June and July 2011 for 33 of the 59 exceptions.

23 of the 59 total exceptions were coded as withdrawn to homeschooling. The area Education Service Center (ESC) approves all homeschooling for all Local School Districts. We obtained the list of students approved by the area ESC for Northridge. None of the students listed as withdrawn to homeschooling were on the approval list. Additionally these 23 withdrawals were entered retroactively.

See Section 12.1 of this report for a list of Northridge LSD schools with a systemic lack of student attendance supporting documentation.

10.3.9. WINTON WOODS CITY SCHOOL DISTRICT

Following the initial AOS student attendance and accountability examination, Winton Woods City School District, Hamilton County (the District), self-reported its findings that District Officials had identified a limited number of students whose attendance records were improperly report by its EMIS Coordinator for fiscal year ended June 30, 2012. This information was discovered by the District after conduction an internal investigation to determine the scope and frequency of suspect EMIS data adjustments discovered during a compilation and review of documents related to a public records request. Following the discovery of suspect EMIS data adjustments, the District notified the AOS of its findings and the subsequent dismissal of the EMIS Coordinator. Based, in part, upon the District's disclosure, the AOS then requested, and was granted, permission to access the District's student information on DASL, the District's student information system. The District cooperated fully with the AOS investigation. As part of the scope of the audit the AOS obtained and examined the fiscal year ended June 30, 2011 information from DASL. Based upon the review of this information it was discovered that seventy-four (74) students, out of a total of 245 district students reported on the State wide report card only, were retroactively withdrawn from the District.

Based upon the above information, the AOS collected a sample of thirty (30) student files from the seventy-four (74) students who were retroactively withdraw. Our result indicated that there were fourteen (14) improper withdraws noted in the sample files. These errors included backdating expulsion dates, which had the effect of elimination the student's test scores, even though the expulsion appeared to have occurred after the test date. Other errors included students who were enrolled into an education program after, and as an alternative to expulsion. In certain situations, these students were erroneously reported as withdrawn due to the expulsion, even though they had been diverted into an alternative education program by the District.

See Section **12.1** of this report for a list of Winton Woods CSD schools with a systemic lack of student attendance supporting documentation.

10.4. CONCLUSION

This report includes findings about the AOS statewide assessment of school year 2010-11 student attendance and enrollment systems for select Ohio schools. AOS will refer the schools with evidence of scrubbing listed in Sections **10.3** and **12.1** of this report to ODE for further investigation and recalculation of the school report cards. Additionally, AOS will request that ODE consider reviewing the schools with errors listed in Sections **12.2**, **12.4**, **12.5**, and **12.6** of this report to determine whether the number or nature of errors AOS identified requires further assessment of the school report cards by ODE. As described in Ohio Rev. Code Chapter 3301.0714(L), ODE has express authority to investigate and take certain actions with regard to the submission of inaccurate EMIS data. Similarly, the schools with evidence of data scrubbing will be referred to the U.S. Department of Education Office of the Inspector General (IG) for review. It is anticipated that the IG will review these findings in the context of Federal law, and will consult with the United States Attorneys for the Northern and Southern Districts of Ohio.

Additionally, AOS updated its regular school district financial audit and single audit procedures to include testing for irregular attendance practices and potential scrubbing for fiscal year 2011-2012 and subsequent audit periods.

11. SCHOOLS SELECTED FOR TESTING

For purposes of this report, “State Roll Up Students” are those students counted only in the State’s report card for attendance and “Tested State Roll Up Students” are the State Roll Up Students that took the State assessment tests.

11.1. PHASE ONE

Using attendance data reported by schools to ODE for the 2010-11 school year, AOS selected the following top 100 schools (as opposed to districts) with the highest number of student withdrawals for Phase One testing:

PHASE ONE SCHOOLS SELECTED FOR TESTING										
	District IRN	School District Name	School IRN	School Name	County Name	State Roll Up Students	Percent of State Roll Up Students	Tested State Roll Up Students	Percent of Tested State Roll Up Students	Total State Roll Up Students
1.	043489	Akron City	009268	Akron Opportunity Center	Summit	43	29.7%	24	16.6%	145
2.	043489	Akron City	027565	North High School	Summit	310	33.0%	75	8.0%	939
3.	046623	Ansonia Local	000778	Ansonia High School	Darke	33	13.8%	27	11.3%	239
4.	045229	Bradford Exempted Village	003376	Bradford High School	Miami	93	22.6%	56	13.6%	412
5.	043703	Campbell City	024190	Memorial High School	Mahoning	82	17.7%	52	11.3%	462
6.	043703	Campbell City	031237	Campbell Middle School	Mahoning	85	18.3%	52	11.2%	465
7.	043711	Canton City	140152	Choices Alternative School	Stark	182	57.2%	162	50.9%	318
8.	043711	Canton City	042648	Community Educational Services	Stark	24	46.2%	11	21.2%	52
9.	043711	Canton City	015495	Hartford Middle School	Stark	41	15.3%	24	9.0%	268
10.	048793	Cardington-Lincoln Local	004861	Cardington-Lincoln High School	Morrow	79	18.0%	59	13.5%	438
11.	043752	Cincinnati City	015818	George Hays-Jennie Porter Elementary	Hamilton	139	32.8%	65	15.3%	424
12.	043752	Cincinnati City	006015	Chase Elementary School	Hamilton	144	33.6%	54	12.6%	428
13.	043752	Cincinnati City	029009	Oyler School	Hamilton	278	34.7%	88	11.0%	802
14.	043752	Cincinnati City	030957	Quebec Heights Elementary School	Hamilton	171	33.9%	47	9.3%	504
15.	043752	Cincinnati City	033134	South Avondale Elementary School	Hamilton	177	28.1%	55	8.7%	629
16.	043760	Circleville City	027201	Nicholas Elementary School	Pickaway	37	19.3%	20	10.4%	192
17.	043794	Cleveland Heights-University Heights City	002212	Bellefaire	Cuyahoga	100	72.5%	48	34.8%	138
18.	043786	Cleveland Municipal City	037101	Thomas Jefferson School	Cuyahoga	258	91.2%	149	52.7%	283
19.	043786	Cleveland Municipal City	018416	John Marshall High School	Cuyahoga	772	47.6%	607	37.4%	1,622
20.	043786	Cleveland Municipal City	018382	John F Kennedy High School	Cuyahoga	670	51.7%	478	36.9%	1,296

PHASE ONE SCHOOLS SELECTED FOR TESTING										
	District IRN	School District Name	School IRN	School Name	County Name	State Roll Up Students	Percent of State Roll Up Students	Tested State Roll Up Students	Percent of Tested State Roll Up Students	Total State Roll Up Students
21.	043786	Cleveland Municipal City	009555	East Technical High School	Cuyahoga	553	49.0%	384	34.0%	1,128
22.	043786	Cleveland Municipal City	025650	Mound Elementary School	Cuyahoga	122	40.5%	93	30.9%	301
23.	043786	Cleveland Municipal City	013680	Glenville High School	Cuyahoga	569	44.5%	385	30.1%	1,280
24.	043786	Cleveland Municipal City	062315	Lincoln-West High School	Cuyahoga	788	46.8%	477	28.4%	1,682
25.	043786	Cleveland Municipal City	025874	The School of One	Cuyahoga	98	50.3%	54	27.7%	195
26.	043786	Cleveland Municipal City	006940	Collinwood High School	Cuyahoga	455	47.2%	260	26.9%	965
27.	043786	Cleveland Municipal City	018325	John Adams High School	Cuyahoga	603	43.6%	347	25.1%	1,382
28.	043786	Cleveland Municipal City	024687	Miles School	Cuyahoga	149	32.7%	113	24.8%	456
29.	043786	Cleveland Municipal City	012682	Fullerton School	Cuyahoga	151	30.7%	110	22.4%	492
30.	043786	Cleveland Municipal City	067918	Buckeye-Woodland School	Cuyahoga	124	33.3%	83	22.3%	372
31.	043786	Cleveland Municipal City	039149	Walton School	Cuyahoga	225	34.1%	140	21.2%	660
32.	043786	Cleveland Municipal City	000489	Almira	Cuyahoga	132	29.4%	95	21.2%	449
33.	043802	Columbus City	040782	Westmoor Middle School	Franklin	166	27.6%	166	27.6%	601
34.	043802	Columbus City	035253	Southmoor Middle School	Franklin	129	26.7%	129	26.7%	484
35.	043802	Columbus City	035824	Starling Middle School	Franklin	86	25.6%	86	25.6%	336
36.	043802	Columbus City	005827	Champion Middle School	Franklin	82	25.5%	82	25.5%	322
37.	043802	Columbus City	042499	Yorktown Middle School	Franklin	140	25.3%	140	25.3%	554
38.	043802	Columbus City	024067	Medina Middle School	Franklin	139	24.9%	139	24.9%	558
39.	043802	Columbus City	018465	Johnson Park Middle School	Franklin	124	23.8%	124	23.8%	522
40.	043802	Columbus City	016386	Hilltonia Middle School	Franklin	129	20.6%	129	20.6%	626
41.	043802	Columbus City	004135	Buckeye Middle School	Franklin	132	20.5%	132	20.5%	644
42.	043802	Columbus City	034439	Sherwood Middle School	Franklin	111	21.1%	111	21.1%	526
43.	045344	Crestline Exempted Village	035154	Crestline Southeast Elementary School	Crawford	73	32.3%	23	10.2%	226
44.	043844	Dayton City	023986	Meadowdale High School	Montgomery	179	24.9%	76	10.6%	718
45.	043844	Dayton City	023978	Meadowdale PreK-8 School	Montgomery	130	23.7%	50	9.1%	549
46.	043950	Euclid City	010819	Euclid High School	Cuyahoga	491	18.8%	285	10.9%	2,618

PHASE ONE SCHOOLS SELECTED FOR TESTING										
	District IRN	School District Name	School IRN	School Name	County Name	State Roll Up Students	Percent of State Roll Up Students	Tested State Roll Up Students	Percent of Tested State Roll Up Students	Total State Roll Up Students
47.	048843	Franklin Local	062224	Roseville Elementary School	Muskingum	49	33.1%	18	12.2%	148
48.	044040	Garfield Heights City	013144	Garfield Heights Middle School	Cuyahoga	200	19.2%	107	10.2%	1,044
49.	044107	Hamilton City	013102	Garfield Middle School	Butler	169	20.0%	105	12.4%	845
50.	044107	Hamilton City	000467	Hamilton Education Center	Butler	659	87.7%	88	11.7%	751
51.	044107	Hamilton City	036822	Hamilton High School	Butler	293	15.0%	228	11.7%	1,955
52.	046953	Hamilton Local	000118	Hamilton Intermediate School	Franklin	170	19.7%	107	12.4%	862
53.	046953	Hamilton Local	028407	Hamilton Middle School	Franklin	99	17.9%	68	12.3%	552
54.	048686	Jefferson Township Local	018150	Jefferson High School	Montgomery	90	29.3%	34	11.1%	307
55.	044222	Lima City	020677	Lima Alternative	Allen	28	47.5%	25	42.4%	59
56.	044263	Lorain City	012335	New Beginnings	Lorain	125	57.6%	61	28.1%	217
57.	044263	Lorain City	000840	General Johnnie Wilson Middle School	Lorain	104	19.6%	55	10.4%	530
58.	044263	Lorain City	000841	Longfellow Middle School	Lorain	86	16.5%	44	8.4%	521
59.	044297	Mansfield City	135566	Mansfield Integrated Learning Center, Hedges Campus	Richland	28	26.7%	13	12.4%	105
60.	044339	Marion City	015214	Harding High School	Marion	348	21.0%	208	12.5%	1,660
61.	048520	Meigs Local	024117	Meigs High School	Meigs	125	17.4%	81	11.3%	717
62.	046672	Mississinawa Valley Local	025122	Mississinawa Valley JR/SR High School	Darke	68	18.9%	38	10.6%	359
63.	044412	Mt Healthy City	035105	Mt Healthy Junior High School	Hamilton	147	23.3%	84	13.3%	631
64.	044446	Nelsonville-York City	026567	Nelsonville-York High School	Athens	73	16.3%	50	11.2%	447
65.	044461	New Boston Local	028159	Oak Intermediate Elementary School	Scioto	70	34.7%	28	13.9%	202
66.	044479	New Lexington City	064865	New Lexington High School	Perry	125	17.8%	73	10.4%	702
67.	044453	Newark City	009213	Heritage Middle School	Licking	111	22.2%	76	15.2%	501
68.	044453	Newark City	027011	Newark High School	Licking	502	26.5%	249	13.1%	1,895
69.	044511	North College Hill City	026120	North College Hill High School	Hamilton	100	17.5%	66	11.6%	570
70.	048736	Northridge Local	027763	Northridge High School	Montgomery	177	28.7%	94	15.3%	616
71.	048736	Northridge Local	027797	Esther Dennis Middle School	Montgomery	101	24.9%	46	11.4%	405
72.	044628	Painesville City Local	015560	Harvey High School	Lake	287	34.4%	91	10.9%	834

PHASE ONE SCHOOLS SELECTED FOR TESTING										
	District IRN	School District Name	School IRN	School Name	County Name	State Roll Up Students	Percent of State Roll Up Students	Tested State Roll Up Students	Percent of Tested State Roll Up Students	Total State Roll Up Students
73.	044677	Princeton City	030759	Princeton High School	Hamilton	354	18.8%	170	9.0%	1,883
74.	047001	Reynoldsburg City	066738	Baldwin Road Junior High School	Franklin	101	22.4%	46	10.2%	450
75.	046599	Richmond Heights Local	031583	Richmond Heights Secondary School	Cuyahoga	62	17.9%	43	12.4%	347
76.	044784	Sidney City	034561	Sidney High School	Shelby	314	25.8%	176	14.4%	1,218
77.	044818	Springfield City	035527	Springfield High School	Clark	676	28.9%	146	6.2%	2,338
78.	044909	Toledo City	033886	Scott High School	Lucas	283	91.0%	100	32.2%	311
79.	044909	Toledo City	018523	Samuel M. Jones at Gunckel Park Elementary School	Lucas	137	34.8%	91	23.1%	394
80.	044909	Toledo City	014936	Leverette Elementary School	Lucas	119	27.0%	73	16.6%	441
81.	044909	Toledo City	032276	Rogers High School	Lucas	311	32.1%	156	16.1%	970
82.	044909	Toledo City	035865	Start High School	Lucas	554	35.4%	235	15.0%	1,567
83.	044909	Toledo City	068478	East Broadway Elementary School	Lucas	157	29.0%	74	13.7%	542
84.	044909	Toledo City	068460	Byrnedale Middle School	Lucas	121	19.7%	77	12.6%	613
85.	044909	Toledo City	023929	McTigue Elementary School	Lucas	158	25.6%	65	10.5%	618
86.	048694	Trotwood-Madison City	009224	Trotwood-Madison Elementary	Montgomery	116	21.2%	68	12.5%	546
87.	048694	Trotwood-Madison City	022194	Trotwood-Madison Middle School	Montgomery	171	23.2%	87	11.8%	737
88.	048694	Trotwood-Madison City	009223	Madison Park Elementary	Montgomery	116	29.1%	47	11.8%	399
89.	045005	Warrensville Heights City	012392	Eastwood Elementary School	Cuyahoga	76	21.8%	50	14.4%	348
90.	049155	Western Local	040667	Western High School	Pike	100	24.6%	48	11.8%	406
91.	045096	Willard City	026732	New Haven Elementary School	Huron	51	30.7%	37	22.3%	166
92.	045096	Willard City	041301	Willard Middle School	Huron	141	22.6%	112	17.9%	624
93.	045096	Willard City	041319	Willard High School	Huron	124	18.4%	70	10.4%	673
94.	045666	Windham Exempted Village	071381	Windham Junior High School	Portage	59	30.9%	21	11.0%	191
95.	044081	Winton Woods City	066787	Winton Woods Elementary School	Hamilton	118	20.5%	66	11.5%	575
96.	045120	Wooster City	003327	Boys Village	Wayne	113	88.3%	69	53.9%	128
97.	045161	Youngstown City	142224	University Project Learning Center	Mahoning	46	31.7%	21	14.5%	145
98.	045161	Youngstown City	009506	P. Ross Berry Middle School	Mahoning	101	20.6%	57	11.6%	490
99.	045161	Youngstown City	038497	Volney Rogers Junior High School	Mahoning	91	16.4%	52	9.4%	556

PHASE ONE SCHOOLS SELECTED FOR TESTING										
	District IRN	School District Name	School IRN	School Name	County Name	State Roll Up Students	Percent of State Roll Up Students	Tested State Roll Up Students	Percent of Tested State Roll Up Students	Total State Roll Up Students
100.	045161	Youngstown City	031138	Youngstown East High School	Mahoning	176	16.0%	77	7.0%	1,097

Additionally for Phase One, since schools likely adopted their attendance practices over time, many without propensity to introduce “breaks” for the purpose of improving attendance, AOS selected an additional 28 school districts with less students withdraws for testing and comparison purposes. Unlike the “Top 100,” AOS tested all schools within the following selected districts:

PHASE ONE DISTRICTS SELECTED FOR TESTING			
	District Name	County Name	District IRN
1.	Avon Lake City	Lorain	048124
2.	Barnesville Exempted Village	Belmont	045203
3.	Beachwood City	Cuyahoga	043554
4.	Berkshire Local	Geauga	047167
5.	Central Local	Defiance	046714
6.	Crestview Local	Columbiana	046433
7.	Danville Local	Knox	047837
8.	Elgin Local	Marion	048413
9.	Fairland Local	Lawrence	047936
10.	Franklin Local	Muskingum	048843
11.	Fredericktown Local	Knox	047852
12.	Goshen Local	Clermont	046342
13.	Indian Hill Exempted Village	Hamilton	045435
14.	Lakeview Local	Trumbull	050187
15.	Lexington Local	Richland	049437
16.	Lincolnview Local	Van Wert	050369
17.	Lisbon Exempted Village	Columbiana	045450
18.	Madeira City	Hamilton	044289
19.	Manchester Local	Adams	000442
20.	Mohawk Local	Wyandot	050740
21.	Niles City	Trumbull	044495
22.	North Canton City	Stark	044503
23.	Ontario Local	Richland	049478
24.	Otsego Local	Wood	050724
25.	Perry Local	Allen	045781
26.	Revere Local	Summit	050054
27.	Symmes Valley Local	Lawrence	047969
28.	Warren Local	Washington	050500

11.2. PHASE TWO

For Phase Two of the school attendance review, AOS selected the following schools with levies on the November 2012 ballot for testing using attendance data reported by schools to ODE for the 2010-11 school year:

PHASE TWO LEVY SCHOOLS SELECTED FOR TESTING										
	District IRN	School District Name	School IRN	School Name	County Name	State Roll Up Students ¹¹	Percent of State Roll Up Students ¹²	Tested State Roll Up Students ¹³	Percent of Tested State Roll Up Students ¹⁴	Total Students ¹⁵
1.	043489	Akron City	000363	Akron Alternative Academy	Summit	209	43%	145	29.8%	486
2.	043521	Athens City	001149	Athens High School	Athens	114	12.6	68	7.5%	907
3.	043539	Barberton City	016170	Highland Middle School	Summit	139	27.5	42	8.3%	505
4.	043539	Barberton City	018457	Johnson Elementary School	Summit	151	36.9%	33	8.1%	409
5.	043539	Barberton City	024182	Memorial Elementary School	Summit	111	28.5%	17	4.4%	389
6.	046300	Batavia Local	001693	Batavia Elementary School	Clermont	256	24.5%	43	4.1%	1,044
7.	046300	Batavia Local	124859	Batavia Middle School	Clermont	154	20.6%	67	9%	748
8.	047241	Beavercreek City	034181	Shaw Elementary School	Greene	140	15.7%	43	4.8%	894
9.	043570	Bellaire Local	142513	Bellaire Middle School	Belmont	116	23.3%	47	9.4%	498
10.	049692	Bettsville Local	002626	Bettsville High School	Seneca	15	20.5%	4	5.5%	73
11.	049692	Bettsville Local	122077	Bettsville Middle School	Seneca	30	39%	5	6.5%	77
12.	043638	Bowling Green City	007773	Crim Elementary School	Wood	68	20.2%	29	8.6%	336
13.	043638	Bowling Green City	024950	Milton Elementary School	Wood	38	24.2%	8	5.1%	157
14.	043638	Bowling Green City	031625	Ridge Elementary School	Wood	41	22.7%	15	8.3%	181
15.	043695	Cambridge City	004622	Cambridge High School	Guernsey	197	22.6%	58	6.7%	871
16.	043695	Cambridge City	004614	Cambridge Middle School	Guernsey	110	17.2%	31	4.9%	638
17.	047829	Centerburg Local	000187	Centerburg Middle School	Knox	25	9.3%	9	3.3%	270
18.	043737	Centerville City	027342	Normandy Elementary School	Montgomery	72	12.3%	27	4.6%	586
19.	043752	Cincinnati City	032797	Rothenberg Preparatory Academy	Hamilton	143	34.3%	51	12.2%	417

11 This is the number of SSID's rolled up to the State's attendance rate in the report card.

12 This is the percentage of SSID's rolled up to the State's attendance rate in the report card.

13 This is the number of SSID's that had at least one assessment test record and were rolled up to the State's attendance rate in the report card.

14 This is the percentage of SSID's that had at least one assessment test record and were rolled up to the State's attendance rate in the report card.

15 This is the number of unique SSID's reported by the school, which includes any student that was present in the school for any length of time during the school year (which may not have been a period long enough to be included in the report card for Accountability purposes).

PHASE TWO LEVY SCHOOLS SELECTED FOR TESTING										
	District IRN	School District Name	School IRN	School Name	County Name	State Roll Up Students ¹¹	Percent of State Roll Up Students ¹²	Tested State Roll Up Students ¹³	Percent of Tested State Roll Up Students ¹⁴	Total Students ¹⁵
20.	048488	Cloverleaf Local	034041	Cloverleaf Elemen- tary School	Medina	54	12.8%	32	7.6%	422
21.	049999	Coventry Local	019638	Erwine Intermediate School	Summit	59	17%	19	5.5%	348
22.	049189	Crestwood Local	089680	Crestwood/ Larham	Portage	13	92.9%	10	71.4%	14
23.	047027	Dublin City	099580	Albert Chapman Elementary School	Franklin	77	13.1%	26	4.4%	587
24.	047027	Dublin City	098475	Ann Simpson Davis Middle School	Franklin	96	10%	93	9.7%	963
25.	047027	Dublin City	099598	Daniel Wright Elementary School	Franklin	117	19.2%	51	8.4%	608
26.	047027	Dublin City	120485	Dublin Scioto High School	Franklin	132	9.9%	81	6.1%	1,327
27.	047027	Dublin City	098483	Griffith Thomas Elementary School	Franklin	101	14.4%	37	5.3%	700
28.	047027	Dublin City	017368	Indian Run Elementary School	Franklin	80	11.6%	27	3.9%	688
29.	047027	Dublin City	098491	Wyandot Elementary School	Franklin	104	16%	43	6.6%	651
30.	047845	East Knox Local	002808	East Knox Elementary School	Knox	100	14.4%	17	2.4%	694
31.	047795	Edison Local	018218	Edison High School	Jefferson	135	17.8%	25	3.3%	757
32.	047795	Edison Local	035493	Edison Jr. High School	Jefferson	31	10.2%	5	1.7%	303
33.	047795	Edison Local	018374	John E Gregg Elementary School	Jefferson	97	25.2%	7	1.8%	385
34.	047795	Edison Local	030296	Pleasant Hill Elementary School	Jefferson	73	20.5%	5	1.4%	356
35.	047795	Edison Local	035790	Stanton Elementary School	Jefferson	191	26.6%	18	2.5%	717
36.	043943	Elyria City	012369	Franklin Elementary School	Lorain	130	23.9%	30	5.5%	543
37.	049775	Fairlawn Local	011163	Fairlawn High School	Shelby	63	16.8%	31	8.3%	374
38.	044016	Fremont City	039354	WashingtonElemen- tary School	Sandusky	66	29.5%	12	5.4%	224
39.	049619	Green Local	014373	Green High School	Scioto	88	26.3%	15	4.5%	334
40.	048751	Huber Heights City	019257	Kitty Hawk Elementary School	Mont- gomery	113	25.5%	10	2.3%	444
41.	048751	Huber Heights City	037317	Lamendola Elementary School	Mont- gomery	105	18.1%	33	5.7%	581
42.	048686	Jefferson Township Local	002824	Blairwood Elementary School	Mont- gomery	79	29.8%	21	7.9%	265
43.	047985	Johnstown- Monroe Local	018473	Willis C Adams Middle School	Licking	23	5.2%	9	2%	440
44.	048009	Licking Heights Local	067868	Licking Heights Central	Licking	117	14.1%	45	5.4%	829
45.	048009	Licking Heights Local	020461	Licking Heights High School	Licking	150	16.2%	74	8%	926
46.	044222	Lima City	000472	Liberty Arts Magnet K-8	Allen	154	37.7%	14	3.4%	409

PHASE TWO LEVY SCHOOLS SELECTED FOR TESTING

	District IRN	School District Name	School IRN	School Name	County Name	State Roll Up Students ¹¹	Percent of State Roll Up Students ¹²	Tested State Roll Up Students ¹³	Percent of Tested State Roll Up Students ¹⁴	Total Students ¹⁵
47.	044222	Lima City	035097	Lima South Science- Technology Magnet K-8	Allen	189	39.5%	44	9.2%	479
48.	044222	Lima City	040576	Lima West Middle School	Allen	197	37.1%	32	6%	531
49.	044222	Lima City	008296	Progressive Academy	Allen	188	35.3%	52	9.8%	533
50.	044263	Lorain City	010208	Academic Enrich- ment Academy	Lorain	243	34.1%	139	19.5%	713
51.	044297	Mansfield City	022301	Mansfield Middle School	Richland	212	35%	41	6.8%	606
52.	044297	Mansfield City	027078	Newman Elemen- tary School	Richland	236	47.9%	7	1.4%	493
53.	044354	Massillon City	010488	Emerson Elementary School	Stark	47	25%	10	5.3%	188
54.	044388	Medina City	011707	Evolve Academy	Medina	7	50%	3	21.4%	14
55.	044420	Mount Vernon City	008029	Dan Emmett Elementary School	Knox	86	22.8%	27	7.1%	378
56.	044420	Mount Vernon City	061465	Pleasant Street Elementary School	Knox	138	23.2%	25	4.2%	596
57.	047365	Northwest Local	064683	Northwest High School	Hamilton	151	13.4%	64	5.7%	1,126
58.	047365	Northwest Local	043315	Pleasant Run Middle School	Hamilton	122	14.1%	64	7.4%	868
59.	047365	Northwest Local	036921	Taylor Elementary School	Hamilton	109	19.7%	24	4.3%	554
60.	044594	Oberlin City	028399	Oberlin High School	Lorain	41	10.3%	20	5%	398
61.	049213	Rootstown Local	032599	Rootstown Elemen- tary School	Portage	87	13.3%	24	3.7%	652
62.	091397	Tri-County North Local	037697	Tri-County North High School	Preble	46	12.6%	14	3.8%	365
63.	045922	Trimble Local	037556	Trimble Elementary School	Athens	96	21.9%	14	3.2%	438
64.	045922	Trimble Local	013755	Trimble High School	Athens	37	12.8%	24	8.3%	289
65.	050070	Twinsburg City	136101	Twinsburg High School	Summit	98	6.8%	68	4.7%	1,440
66.	045054	West Carroll- ton City	016584	C F Holliday Elementary School	Mont- gomery	116	23.9%	38	7.8%	486
67.	045054	West Carroll- ton City	027219	Frank Nicholas Elementary School	Mont- gomery	36	16.7%	10	4.7%	215
68.	045054	West Carroll- ton City	033027	Harry Russell Elementary School	Mont- gomery	93	21.7%	31	7.2%	429
69.	045054	West Carroll- ton City	038588	West Carrollton High School	Mont- gomery	227	17.9%	116	9.2%	1266
70.	046359	West Clermont Local	089565	Holly Hill Elementary School	Clermont	72	14.9%	23	4.8%	482
71.	046359	West Clermont Local	041897	Withamsville- Tobasco Elementary School	Clermont	113	18.3%	25	4.1%	616
72.	046060	Western Brown Local	014886	Hamersville Elementary School	Brown	220	26.5%	30	3.6%	830

PHASE TWO LEVY SCHOOLS SELECTED FOR TESTING										
	District IRN	School District Name	School IRN	School Name	County Name	State Roll Up Students ¹¹	Percent of State Roll Up Students ¹²	Tested State Roll Up Students ¹³	Percent of Tested State Roll Up Students ¹⁴	Total Students ¹⁵
73.	046060	Western Brown Local	025866	Western Brown High School	Brown	216	18.3%	47	4%	1,180
74.	045096	Willard City	031559	Richmond Elementary School	Huron	25	16.4%	14	9.2%	152
75.	049973	Woodridge Local	123034	Woodridge Intermediate Elementary School	Summit	83	16.4%	33	6.5%	507
76.	045138	Worthington City	003822	Brookside Elemen- tary School	Franklin	30	9.1%	8	2.4%	330
77.	045138	Worthington City	042275	Worthington Estates Elementary School	Franklin	63	11.4%	27	4.9%	553
78.	045138	Worthington City	098087	Worthington Park Elementary School	Franklin	66	13.5%	40	8.2%	488
79.	045153	Xenia Com- munity City	018838	Simon Kenton Elementary School	Greene	150	30%	18	3.6%	500
80.	045161	Youngstown City	000342	Youngstown Virtual Academy	Mahoning	59	51.3%	35	30.4%	115
81.	049544	Zane Trace Local	042572	Zane Trace High School	Ross	93	15.2%	24	3.9%	613

11.3. PHASE THREE

For Phase Three, AOS selected additional schools based on whether they exceed a cutoff of 0.06 in the predicted probability generated by the procedures we describe in Section 9. The schools AOS identified as schools with evidence of scrubbing in Phase One are all associated with predicted probabilities above this cutoff. This cutoff generated the following list of 172 schools, 70 of which AOS already tested in earlier phases:

PHASE THREE SCHOOLS SELECTED FOR TESTING								
	Dist IRN	District Name	Bldg IRN	School Name	County	Tested Phase I	Evidence of Scrubbing	Tested Phase II
1.	043786	Cleveland Municipal City	018382	John F Kennedy High School	Cuyahoga	Yes	Yes	No
2.	043786	Cleveland Municipal City	013680	Glenville High School	Cuyahoga	Yes	Yes	No
3.	043786	Cleveland Municipal City	037101	Thomas Jefferson School	Cuyahoga	Yes	Yes	No
4.	043802	Columbus City	040782	Westmoor Middle School	Franklin	Yes	Yes	No
5.	043786	Cleveland Municipal City	018416	John Marshall High School	Cuyahoga	Yes	Yes	No
6.	043786	Cleveland Municipal City	009555	East Technical High School	Cuyahoga	Yes	Yes	No
7.	043802	Columbus City	035253	Southmoor Middle School	Franklin	Yes	Yes	No
8.	043802	Columbus City	070078	Mifflin Alternative Middle School	Franklin	No	No	No
9.	043786	Cleveland Municipal City	025874	The School of One	Cuyahoga	Yes	Yes	No
10.	043786	Cleveland Municipal City	006940	Collinwood High School	Cuyahoga	Yes	Yes	No
11.	043802	Columbus City	005827	Champion Middle School	Franklin	Yes	Yes	No
12.	043802	Columbus City	035824	Starling Middle School	Franklin	Yes	Yes	No
13.	043802	Columbus City	024067	Medina Middle School	Franklin	Yes	Yes	No
14.	043802	Columbus City	042499	Yorktown Middle School	Franklin	Yes	Yes	No
15.	043786	Cleveland Municipal City	012682	Fullerton School	Cuyahoga	Yes	Yes	No
16.	043786	Cleveland Municipal City	062315	Lincoln-West High School	Cuyahoga	Yes	Yes	No
17.	043802	Columbus City	018465	Johnson Park Middle School	Franklin	Yes	Yes	No
18.	043786	Cleveland Municipal City	067918	Buckeye-Woodland School	Cuyahoga	Yes	Yes	No
19.	043786	Cleveland Municipal City	018325	John Adams High School	Cuyahoga	Yes	Yes	No
20.	043802	Columbus City	021030	Linden-Mckinley STEM Academy	Franklin	No	No	No
21.	043786	Cleveland Municipal City	039149	Walton School	Cuyahoga	Yes	Yes	No
22.	043802	Columbus City	016386	Hilltonia Middle School	Franklin	Yes	Yes	No
23.	043802	Columbus City	000513	Alum Crest High School	Franklin	No	No	No
24.	043786	Cleveland Municipal City	000489	Almira	Cuyahoga	Yes	Yes	No
25.	043802	Columbus City	034439	Sherwood Middle School	Franklin	Yes	Yes	No
26.	043786	Cleveland Municipal City	024687	Miles School	Cuyahoga	Yes	Yes	No
27.	043786	Cleveland Municipal City	025650	Mound Elementary School	Cuyahoga	Yes	Yes	No
28.	043802	Columbus City	120246	Fort Hayes Career Center	Franklin	No	No	No

PHASE THREE SCHOOLS SELECTED FOR TESTING								
	Dist IRN	District Name	Bldg IRN	School Name	County	Tested Phase I	Evidence of Scrubbing	Tested Phase II
29.	043786	Cleveland Municipal City	033902	Scranton School	Cuyahoga	No	No	No
30.	043786	Cleveland Municipal City	023069	Mary B Martin School	Cuyahoga	No	No	No
31.	043802	Columbus City	004135	Buckeye Middle School	Franklin	Yes	Yes	No
32.	044677	Princeton City	011769	Princeton Virtual Academy	Hamilton	No	No	No
33.	049189	Crestwood Local	089680	Crestwood/Larham	Portage	No	No	Yes
34.	045161	Youngstown City	000342	Youngstown Virtual Academy	Mahoning	No	No	Yes
35.	043802	Columbus City	039107	Walnut Ridge High School	Franklin	No	No	No
36.	043794	Cleveland Heights- University Heights City	002212	Bellefaire	Cuyahoga	Yes	No	No
37.	043802	Columbus City	014902	Hamilton STEM Academy (K-6)	Franklin	No	No	No
38.	043786	Cleveland Municipal City	005900	Charles Dickens School	Cuyahoga	No	No	No
39.	044909	Toledo City	018523	Samuel M. Jones at Gunckel Park Elementary School	Lucas	Yes	Yes	No
40.	043802	Columbus City	026542	Special Education Center	Franklin	No	No	No
41.	043786	Cleveland Municipal City	029421	Paul Revere Elementary School	Cuyahoga	No	No	No
42.	044230	Lockland Local	000663	Arlington Heights Academy	Hamilton	No	***	No
43.	043786	Cleveland Municipal City	065565	Marion C Seltzer Elementary School	Cuyahoga	No	No	No
44.	043786	Cleveland Municipal City	013847	H Barbara Booker Elementary School	Cuyahoga	No	No	No
45.	043786	Cleveland Municipal City	062778	Joseph M Gallagher School	Cuyahoga	No	No	No
46.	043786	Cleveland Municipal City	05066	Case	Cuyahoga	No	No	No
47.	043786	Cleveland Municipal City	000729	Andrew J Rickoff	Cuyahoga	No	No	No
48.	043786	Cleveland Municipal City	028720	Orchard School	Cuyahoga	No	No	No
49.	043786	Cleveland Municipal City	023689	McKinley School	Cuyahoga	No	No	No
50.	043786	Cleveland Municipal City	063461	Garrett Morgan Schl Of Science School	Cuyahoga	No	No	No
51.	046797	Kelleys Island Local	018663	Kelleys Island High School	Erie	Untest- ed*	No	Untest- ed*
52.	043786	Cleveland Municipal City	005892	Charles A Mooney School	Cuyahoga	No	No	No
53.	043786	Cleveland Municipal City	029371	Patrick Henry School	Cuyahoga	No	No	No
54.	043786	Cleveland Municipal City	026443	Nathan Hale School	Cuyahoga	No	No	No
55.	043786	Cleveland Municipal City	041541	Willson School	Cuyahoga	No	No	No
56.	043786	Cleveland Municipal City	010561	Emile B Desauze Elementary School	Cuyahoga	No	No	No
57.	043844	Dayton City	012864	Gardendale Academy	Montgomery	No	No	No
58.	043786	Cleveland Municipal City	010801	Euclid Park Elementary School	Cuyahoga	No	No	No
59.	043786	Cleveland Municipal City	041236	Wilbur Wright School	Cuyahoga	No	No	No

PHASE THREE SCHOOLS SELECTED FOR TESTING								
	Dist IRN	District Name	Bldg IRN	School Name	County	Tested Phase I	Evidence of Scrubbing	Tested Phase II
60.	043786	Cleveland Municipal City	032060	Robert H Jamison School	Cuyahoga	No	No	No
61.	043802	Columbus City	070102	Columbus Downtown High School	Franklin	No	No	No
62.	044909	Toledo City	033886	Scott High School	Lucas	Yes	Yes	No
63.	043802	Columbus City	021014	Lindbergh Elementary School	Franklin	No	No	No
64.	043786	Cleveland Municipal City	000828	Anton Grdina	Cuyahoga	No	No	No
65.	043802	Columbus City	003764	Brookhaven High School	Franklin	No	No	No
66.	045120	Wooster City	003327	Boys Village	Wayne	Yes	No	No
67.	043786	Cleveland Municipal City	029413	Paul L Dunbar Elementary School @ Kentucky	Cuyahoga	No	No	No
68.	043786	Cleveland Municipal City	013292	George Washington Carver	Cuyahoga	No	No	No
69.	043802	Columbus City	066431	Clearbrook Middle School	Franklin	No	No	No
70.	043802	Columbus City	042184	Woodward Park Middle School	Franklin	No	No	No
71.	043786	Cleveland Municipal	062760	Luis Munoz Marin School	Cuyahoga	No	No	No
72.	043802	Columbus City	009076	East Linden Elementary School	Franklin	No	No	No
73.	043802	Columbus City	138099	Columbus Global Academy	Franklin	No	No	No
74.	043786	Cleveland Municipal City	042002	Woodland Hills School	Cuyahoga	No	No	No
75.	043786	Cleveland Municipal City	021543	Franklin D. Roosevelt	Cuyahoga	No	No	No
76.	043802	Columbus City	024661	Mifflin High School	Franklin	No	No	No
77.	043786	Cleveland Municipal City	015578	Harvey Rice Elementary School	Cuyahoga	No	No	No
78.	043802	Columbus City	026245	North Linden Elementary School	Franklin	No	No	No
79.	044222	Lima City	020677	Lima Alternative	Allen	Yes	No	No
80.	045161	Youngstown City	043125	Choffin Career & Technical Center	Mahoning	Untest- ed*	No	Untest- ed*
81.	044453	Newark City	009213	Heritage Middle School	Licking	Yes	No	No
82.	048843	Franklin Local	062224	Roseville Elementary School	Muskingum	Yes	No	No
83.	044388	Medina City	011707	Evolve Academy	Medina	No	No	Yes
84.	043786	Cleveland Municipal City	027102	Newton D Baker School	Cuyahoga	No	No	No
85.	043786	Cleveland Municipal City	000224	Adlai Stevenson School	Cuyahoga	No	No	No
86.	043802	Columbus City	008037	Dana Avenue Elementary School	Franklin	No	No	No
87.	043786	Cleveland Municipal City	005942	Charles W Eliot School	Cuyahoga	No	No	No
88.	043786	Cleveland Municipal City	024695	Miles Park School	Cuyahoga	No	No	No
89.	043786	Cleveland Municipal City	010201	Design Lab @ Jane Addams	Cuyahoga	No	No	No
90.	043802	Columbus City	023275	Maybury Elementary School	Franklin	No	No	No
91.	043786	Cleveland Municipal City	005637	Carl & Louis Stokes Central Academy	Cuyahoga	No	No	No
92.	043786	Cleveland Municipal City	017830	James Ford Rhodes High School	Cuyahoga	No	No	No
93.	043802	Columbus City	038562	West Broad Elementary School	Franklin	No	No	No
94.	043786	Cleveland Municipal City	068221	Kenneth W Clement	Cuyahoga	No	No	No

PHASE THREE SCHOOLS SELECTED FOR TESTING

	Dist IRN	District Name	Bldg IRN	School Name	County	Tested Phase I	Evidence of Scrubbing	Tested Phase II
95.	043786	Cleveland Municipal City	001040	Artemus Ward	Cuyahoga	No	No	No
96.	043802	Columbus City	011312	Fairwood Alternative Elementary School	Franklin	No	No	No
97.	043786	Cleveland Municipal City	021527	Louis Agassiz School	Cuyahoga	No	No	No
98.	044263	Lorain City	010208	Academic Enrichment Academy	Lorain	No	No	Yes**
99.	044909	Toledo City	035865	Start High School	Lucas	Yes	Yes	No
100.	043703	Campbell City	024190	Memorial High School	Mahoning	Yes	Yes	No
101.	043752	Cincinnati City	015818	George Hays-Jennie Porter Elementary	Hamilton	Yes	No	No
102.	043786	Cleveland Municipal City	037747	Union Elementary School	Cuyahoga	No	No	No
103.	044230	Lockland Local	010243	Lockland Local Middle School	Hamilton	No	***	No
104.	045096	Willard City	041301	Willard Middle School	Huron	Yes	No	No
105.	043786	Cleveland Municipal City	039685	Washington Park	Cuyahoga	No	No	No
106.	043786	Cleveland Municipal City	039875	Watterson-Lake School	Cuyahoga	No	No	No
107.	045005	Warrensville Heights City	012392	Eastwood Elementary School	Cuyahoga	Yes	No	No
108.	044461	New Boston Local	028159	Oak Intermediate Elementary School	Scioto	Yes	No	No
109.	043786	Cleveland Municipal City	023259	Max S Hayes High School	Cuyahoga	No	No	No
110.	045161	Youngstown City	142224	University Project Learning Center	Mahoning	Yes	No	No
111.	043786	Cleveland Municipal City	015073	Hannah Gibbons-Nottingham Elementary School	Cuyahoga	No	No	No
112.	043711	Canton City	140152	Choices Alternative School	Stark	Yes	No	No
113.	043786	Cleveland Municipal City	062737	Giddings	Cuyahoga	No	No	No
114.	048793	Cardington-Lincoln Local	004861	Cardington-Lincoln High School	Morrow	Yes	No	No
115.	043786	Cleveland Municipal City	024703	Michael R. White	Cuyahoga	No	No	No
116.	043786	Cleveland Municipal City	004820	Captain Arthur Roth	Cuyahoga	No	No	No
117.	043752	Cincinnati City	142398	Virtual High School	Hamilton	No	No	No
118.	044909	Toledo City	032276	Rogers High School	Lucas	Yes	Yes	No
119.	043570	Bellaire Local	142513	Bellaire Middle School	Belmont	No	No	Yes**
120.	043786	Cleveland Municipal City	023085	Mary M Bethune	Cuyahoga	No	No	No
121.	043802	Columbus City	009514	East High School	Franklin	No	No	No
122.	044263	Lorain City	012335	New Beginnings	Lorain	Yes	No	No
123.	043802	Columbus City	040162	Wedgewood Middle School	Franklin	No	No	No
124.	044909	Toledo City	014936	Leverette Elementary School	Lucas	Yes	Yes	No
125.	046953	Hamilton Local	028407	Hamilton Middle School	Franklin	Yes	No	No
126.	043802	Columbus City	015982	Heyl Avenue Elementary School	Franklin	No	No	No
127.	043802	Columbus City	016113	Highland Elementary School	Franklin	No	No	No
128.	044818	Springfield City	010421	Keifer Alternative Academy	Clark	No	No	No

PHASE THREE SCHOOLS SELECTED FOR TESTING

	Dist IRN	District Name	Bldg IRN	School Name	County	Tested Phase I	Evidence of Scrubbing	Tested Phase II
129.	043802	Columbus City	020974	Lincoln Park Elementary School	Franklin	No	No	No
130.	043786	Cleveland Municipal City	008987	East Clark	Cuyahoga	No	No	No
131.	043802	Columbus City	008581	Dominion Middle School	Franklin	No	No	No
132.	043802	Columbus City	006387	Watkins Elementary School	Franklin	No	No	No
133.	045096	Willard City	026732	New Haven Elementary School	Huron	Yes	No	No
134.	043802	Columbus City	024653	Cassady Alternative Elementary School	Franklin	No	No	No
135.	043844	Dayton City	021394	Longfellow Alternative School	Montgomery	No	No	No
136.	043802	Columbus City	038828	West Mound Elementary School	Franklin	No	No	No
137.	043802	Columbus City	022855	Marion-Franklin High School	Franklin	No	No	No
138.	044909	Toledo City	068478	East Broadway Elementary School	Lucas	Yes	Yes	No
139.	043752	Cincinnati City	006015	Chase Elementary School	Hamilton	Yes	No	No
140.	043802	Columbus City	067736	Independence High School	Franklin	No	No	No
141.	044339	Marion City	015214	Harding High School	Marion	Yes	Yes	No
142.	048694	Trotwood-Madison City	009224	Trotwood-Madison Elementary	Montgomery	Yes	No	No
143.	043786	Cleveland Municipal City	038927	Wade Park	Cuyahoga	No	No	No
144.	044784	Sidney City	034561	Sidney High School	Shelby	Yes	No	No
145.	044909	Toledo City	023929	McTigue Elementary School	Lucas	Yes	Yes	No
146.	043752	Cincinnati City	032797	Rothenberg Preparatory Academy	Hamilton	No	No	Yes**
147.	046953	Hamilton Local	000118	Hamilton Intermediate School	Franklin	Yes	No	No
148.	043802	Columbus City	041749	Windsor STEM Acadmey (K-6)	Franklin	No	No	No
149.	043802	Columbus City	031740	Ridgeview Middle School	Franklin	No	No	No
150.	044081	Winton Woods City	066787	Winton Woods Elementary	Hamilton	Yes	No	No
151.	043802	Columbus City	011997	Columbus City Preparatory School for Boys	Franklin	No	No	No
152.	043489	Akron City	009268	Akron Opportunity Center	Summit	Yes	No	No
153.	044909	Toledo City	023291	Fulton/Kobacker at Robinson	Lucas	No	No	No
154.	043711	Canton City	042648	Community Educational Services	Stark	Yes	No	No
155.	043786	Cleveland Municipal City	010200	MC2 STEM High School	Cuyahoga	No	No	No
156.	043786	Cleveland Municipal City	006353	Clara E Westropp School	Cuyahoga	No	No	No
157.	043489	Akron City	000363	Akron Alternative Academy	Summit	No	No	Yes**
158.	043786	Cleveland Municipal City	006429	Clark School	Cuyahoga	No	No	No
159.	043760	Circleville City	027201	Nicholas Elementary School	Pickaway	Yes	No	No
160.	043802	Columbus City	001917	Beatty Park Elementary School	Franklin	No	No	No
161.	043786	Cleveland Municipal City	009421	Ginn Academy	Cuyahoga	No	No	No
162.	043802	Columbus City	009233	Eakin Elementary School	Franklin	No	No	No
163.	043802	Columbus City	040527	West High School	Franklin	No	No	No
164.	043786	Cleveland Municipal City	032128	Robinson G Jones Elementary School	Cuyahoga	No	No	No
165.	043786	Cleveland Municipal City	012353	New Technology HS@East Tech	Cuyahoga	No	No	No

PHASE THREE SCHOOLS SELECTED FOR TESTING								
	Dist IRN	District Name	Bldg IRN	School Name	County	Tested Phase I	Evidence of Scrubbing	Tested Phase II
166.	046953	Hamilton Local	014944	Hamilton Township High School	Franklin	No	No	No
167.	046672	Mississinawa Valley Local	025122	Mississinawa Valley JR/SR High School	Darke	Yes	No	No
168.	044107	Hamilton City	013102	Garfield Middle School	Butler	Yes	No	No
169.	043844	Dayton City	008299	Dayton Boys Preparatory Academy	Montgomery	No	No	No
170.	043703	Campbell City	031237	Campbell Middle School	Mahoning	Yes	Yes	No
171.	043802	Columbus City	028316	Oakmont Elementary School	Franklin	No	No	No
172.	044909	Toledo City	068460	Byrnedale Middle School	Lucas	Yes	Yes	No

* Due to the low number of tested students rolled up to the State report card or the nature of the services provided by the school, AOS did not believe it was cost effective to test this school. Therefore, AOS did not test this school in either of the first two phases or in phase three.

** For purposes of testing certain Phase Two schools, the AOS chose to sample the attendance records of 30 State-tested students.

The rationale for doing so is described in Section 9.

*** AOS did not test this school; however, based on the results of a review performed by the Ohio Department of Education, this school had evidence of scrubbing. Refer to the Appendix of this report for a copy of ODE's letter to the Lockland Local School District.

12. RESULTS OF STUDENT FILE TESTING FOR SUPPORTING DOCUMENTATION

12.1. SCHOOLS WITH EVIDENCE OF SCRUBBING

The following table describes the schools with evidence of scrubbing identified during the 2010-11 school year.

SCHOOLS WITH EVIDENCE OF SCRUBBING								
	District IRN	School District Name	School Name	County Name	Tested State Roll Up Students	Issues Identified (See Results for additional information)	AOS Testing Phase	Results
								<p>3-Lack of support for various codes.</p> <p>21-Coding errors (code 74) - per initial discussion with District, these students stopped attending Choices program, but based on District would not accept code 71. Therefore District coded as 74.</p> <p>1-Coding error (code 74) - ODE reports student as moved, however E-School System indicates student graduated.</p>
4.	043711	Canton City	Community Educational Services	Stark	11	6	One	<p>Refer to Section 10.3.7 of report.</p> <p>1-No support- over 18 no IEP in files student should not have been included on either district's or State's report card.</p> <p>1-Coding error - District coding reflects code 74, report from ODE reflect code 75. Support in file does not support code 75.</p> <p>4-Errors due to night school students included in report card.</p>
5.	043711	Canton City	Hartford Middle School	Stark	24	0	One	Refer to Section 10.3.7 of report.
6.	043752	Cincinnati City	George Hays-Jennie Porter Elementary	Hamilton	65	31	One	<p>Refer to Section 10.3.4 of report.</p> <p>17-Lack of Support for Break and/or WD Code Issue Noted (8 of 17 to Same School only; 9 of 17 were School to School transfers).</p> <p>14-Code 71 WD with no Court Action Noted.</p>
7.	043752	Cincinnati City	Chase Elementary School	Hamilton	54	19	One	<p>Refer to Section 10.3.4 of report.</p> <p>4-No Cumulative File for SY 10-11.</p> <p>13-Lack of Support for Break and/or WD Code Issue Noted (1 of 13 to Same School only; 12 of 13 were School to School transfers).</p> <p>1-Code 71 WD with no Court Action Noted.</p> <p>1-Multiple SSID assigned to the student.</p>

SCHOOLS WITH EVIDENCE OF SCRUBBING								
	District IRN	School District Name	School Name	County Name	Tested State Roll Up Students	Issues Identified (See Results for additional information)	AOS Testing Phase	Results
8.	043752	Cincinnati City	Oyler School	Hamilton	88	46	One	Refer to Section 10.3.4 of report. 35-Lack of Support for Break and/or WD Code Issue Noted (33 of 35 to Same School only; 2 of 35 were School to School transfers with no evidence of enrollment elsewhere or support for student moving within the file).
								9-Code 71 WD with no Court Action Noted. 2 Students for which W/D Code appear to be incorrect. One student was coded as 40 (transferred to a school district outside of Ohio) when it appears they should have been coded as 42 (transferred to a private school). Another student was coded as 41 (transferred to another Ohio school district) but notes indicated the student was in jail and there was no evidence of attending another Ohio school district.
9.	043752	Cincinnati City	Quebec Heights Elementary School	Hamilton	47	16	One	Refer to Section 10.3.4 of report. 2-No Cumulative File for SY 10-11. Other information was reviewed to support break in enrollment for these students. 10-Lack of Support for Break and/or WD Code Issue Noted (10 of 10 were School to School transfers); 4-Code 71 WD with no Court Action Noted.
10.	043752	Cincinnati City	South Avondale Elementary School	Hamilton	55	18	One	Refer to Section 10.3.4 of report. 1-No Cumulative File. 16-Lack of Support for Break and/or WD Code Issue Noted (11 of 16 were School to School transfers, 1 of 16 was re-enrolled in South Avondale following an attendance break, 2 of 16 had no break in attendance, the remaining 2 had no support on file but other information was available to support proper roll to State). 1- Code 71 WD with no Court Action Noted.
11.	043786	Cleveland Municipal City	John Marshall High School	Cuyahoga	607	Refer to Section 10.3.3 of report.	One	Refer to Section 10.3.3 of report.
12.	043786	Cleveland Municipal City	John F Kennedy High School	Cuyahoga	478	Refer to Section 10.3.3 of report.	One	Refer to Section 10.3.3 of report.
13.	043786	Cleveland Municipal City	East Technical High School	Cuyahoga	384	Refer to Section 10.3.3 of report.	One	Refer to Section 10.3.3 of report.

SCHOOLS WITH EVIDENCE OF SCRUBBING								
	District IRN	School District Name	School Name	County Name	Tested State Roll Up Students	Issues Identified (See Results for additional information)	AOS Testing Phase	Results
14.	043786	Cleveland Municipal City	Mound Elementary School	Cuyahoga	93	Refer to Section 10.3.3 of report.	One	Refer to Section 10.3.3 of report.
15.	043786	Cleveland Municipal	Glenville High School	Cuyahoga	385	Refer to Section 10.3.3 of report.	One	Refer to Section 10.3.3 of report.
16.	043786	Cleveland Municipal City	Lincoln-West High School	Cuyahoga	477	Refer to Section 10.3.3 of report.	One	Refer to Section 10.3.3 of report.
17.	043786	Cleveland Municipal City	The School of One	Cuyahoga	54	Refer to Section 10.3.3 of report.	One	Refer to Section 10.3.3 of report.
18.	043786	Cleveland Municipal City	Collinwood High School	Cuyahoga	260	Refer to Section 10.3.3 of report.	One	Refer to Section 10.3.3 of report.
19.	043786	Cleveland Municipal City	John Adams High School	Cuyahoga	347	Refer to Section 10.3.3 of report.	One	Refer to Section 10.3.3 of report.
20.	043786	Cleveland Municipal City	Miles School	Cuyahoga	113	Refer to Section 10.3.3 of report.	One	Refer to Section 10.3.3 of report.
21.	043786	Cleveland Municipal City	Fullerton School	Cuyahoga	110	Refer to Section 10.3.3 of report.	One	Refer to Section 10.3.3 of report.
22.	043786	Cleveland Municipal City	Buckeye-Woodland School	Cuyahoga	83	Refer to Section 10.3.3 of report.	One	Refer to Section 10.3.3 of report.
23.	043786	Cleveland Municipal City	Walton School	Cuyahoga	140	Refer to Section 10.3.3 of report.	One	Refer to Section 10.3.3 of report.
24.	043786	Cleveland Municipal City	Almira	Cuyahoga	95	Refer to Section 10.3.3 of report.	One	Refer to Section 10.3.3 of report.
25.	043786	Cleveland Municipal City	Thomas Jefferson School	Cuyahoga	149	Refer to Section 10.3.3 of report.	One	Refer to Section 10.3.3 of report.
26.	043802	Columbus City	Westmoor Middle School	Franklin	166	58	One	Refer to Section 10.3.1 of report. Issues related to: <ul style="list-style-type: none"> Files that could not be located. Unsupported admission/re-admission dates. Unsupported withdrawal codes of 40, 41, 43, 71, and 74.
27.	043802	Columbus City	Southmoor Middle School	Franklin	129	16	One	Refer to Section 10.3.1 of report. Issues related to: <ul style="list-style-type: none"> Files that could not be located. Unsupported admission/re-admission dates. Unsupported withdrawal codes of 41.
28.	043802	Columbus City	Starling Middle School	Franklin	86	10	One	Refer to Section 10.3.1 of report. Issues related to: <ul style="list-style-type: none"> Unsupported admission/re-admission dates.

SCHOOLS WITH EVIDENCE OF SCRUBBING								
	District IRN	School District Name	School Name	County Name	Tested State Roll Up Students	Issues Identified (See Results for additional information)	AOS Testing Phase	Results
								<ul style="list-style-type: none"> Unsupported withdrawal codes of 40 and 41.
29.	043802	Columbus City	Champion Middle School	Franklin	82	7	One	<p>Refer to Section 10.3.1 of report.</p> <p>Issues related to:</p> <ul style="list-style-type: none"> Unsupported admission/re-admission dates. Unsupported withdrawal codes of 40 and 41.
30.	043802	Columbus City	Yorktown Middle School	Franklin	140	52	One	<p>Refer to Section 10.3.1 of report.</p> <p>Issues related to:</p> <ul style="list-style-type: none"> Files that could not be located. Unsupported admission/re-admission dates. Unsupported withdrawal codes of 40, 41, 43, and 74.
31.	043802	Columbus City	Medina Middle School	Franklin	139	34	One	<p>Refer to Section 10.3.1 of report.</p> <p>Issues related to:</p> <ul style="list-style-type: none"> Files that could not be located. Unsupported admission/re-admission dates. Unsupported withdrawal codes of 40, 41, 46, and 48.
32.	043802	Columbus City	Hilltonia Middle School	Franklin	129	13	One	<p>Refer to Section 10.3.1 of report.</p> <p>Issues related to:</p> <ul style="list-style-type: none"> Unsupported admission/re-admission dates. Unsupported withdrawal codes of 41.
33.	043802	Columbus City	Buckeye Middle School	Franklin	132	40	One	<p>Refer to Section 10.3.1 of report.</p> <p>Issues related to:</p> <ul style="list-style-type: none"> Files that could not be located. Unsupported admission/re-admission dates. Unsupported withdrawal codes of 40, 41, and 42.
34.	043802	Columbus City	Johnson Park Middle School	Franklin	124	38	One	<p>Refer to Section 10.3.1 of report.</p> <p>Issues related to:</p> <ul style="list-style-type: none"> Files that could not be located. Unsupported admission/re-admission dates.

SCHOOLS WITH EVIDENCE OF SCRUBBING								
	District IRN	School District Name	School Name	County Name	Tested State Roll Up Students	Issues Identified (See Results for additional information)	AOS Testing Phase	Results
								<ul style="list-style-type: none"> Unsupported withdrawal codes of 40, 41, and 46.
35.	043802	Columbus City	Sherwood Middle School	Franklin	111	34	One	<p>Refer to Section 10.3.1 of report.</p> <p>Issues related to:</p> <ul style="list-style-type: none"> Files that could not be located. Unsupported admission/re-admission dates. Unsupported withdrawal codes of 41, 48, and 71.
36.	044339	Marion City	Harding High School	Marion	208	58	One	<p>Refer to Section 10.3.5 of report.</p> <p>12 - exceptions due to students that have graduated and do not have supporting enrollment/withdraw documentation in student file (records purged).</p> <p>46 - failed due to student transferring to Marion City Digital Academy and no parent approval noted in the student file maintained by the District. We also noted letters within files indicating students were automatically withdrawn from Marion City and enrolled in the Marion City Digital Academy during FY '11 if they had 5 or more unexcused absences in a quarter. This transfer was initiated by the District and no parent/guardian approval was noted within files. The District indicated, per the District's attendance policy, that the student had failed for the current quarter based on lack of attendance and was enrolled into the 'credit recovery program' through the Marion City Digital Academy. This practice was discontinued after the FY '11 school year.</p>
37.	048736	Northridge Local	Northridge High School	Montgomery	94	43	One	<p>Refer to Section 10.3.8 of report.</p> <p>19 - Had incomplete withdrawal forms that had notations to readmit the students at a later date.</p> <p>24 - Remaining were due to lack of support and/or incomplete support for withdrawal or admission.</p>
38.	048736	Northridge Local	Esther Dennis Middle School	Montgomery	46	16	One	<p>Refer to Section 10.3.8 of report.</p> <p>16 - Lack of support and/or incomplete support for withdrawal or admission.</p>
39.	044909	Toledo City	Scott High School	Lucas	100	66	One	<p>Refer to Section 10.3.2 of report.</p>

SCHOOLS WITH EVIDENCE OF SCRUBBING								
	District IRN	School District Name	School Name	County Name	Tested State Roll Up Students	Issues Identified (See Results for additional information)	AOS Testing Phase	Results
								<p>31 - 71 Code, Withdraw due to Truancy/Nonattendance, had 31 instances of improper support. No parental notification, no court ordered truancy. Additionally, of these students 16 did not appear to meet the 5/20 rule.</p> <p>15 - 41 Code, Transferred to another Ohio School District, had 15 instances of improper support.</p> <p>1 - 40 Code, Transferred to another School District outside of Ohio, had 1 instances which lacked appropriate support.</p> <p>1 - 45 Code, Transferred by Court Order/Adjudication, had 1 instance of improper support.</p> <p>4 - 99 Code, Completed High School Graduation requirements, had 4 instances which lacked support.</p> <p>1 - 72 Code, Pursued Employment/Work Permit, 1 instance which lacked support.</p> <p>2 - 73 Code, Over 18 years of age, 2 instances which lacked support.</p> <p>2 - 74 Code, Moved not known to be continuing, 2 instances which lacked support.</p> <p>3 - 75 Code, Student Completed Course requirements but did not pass statewide graduation test, 3 instances which lacked support.</p> <p>6 - No reason - 6 students for which no reason or supporting paperwork could be provided for the student being rolled up to the State.</p> <p>No files were provided for 39 students. For the 66 exceptions identified, 53 students had scores below 400 [does not meet State standards] on at least 1 section of the statewide Ohio Graduation Tests.</p>
40.	044909	Toledo City	Samuel M. Jones at Gunckel Park Elementary School	Lucas	91	77	One	<p>Refer to Section 10.3.2 of report.</p> <p>67 - 71 Code, Withdraw due to Truancy/Nonattendance, had 67 instances of improper support. No parental notification, no court</p>

SCHOOLS WITH EVIDENCE OF SCRUBBING								
	District IRN	School District Name	School Name	County Name	Tested State Roll Up Students	Issues Identified (See Results for additional information)	AOS Testing Phase	Results
								<p>ordered truancy. Additionally, 62 of these students did not appear to meet the 5/20 rule.</p> <p>7 - 41 Code, Transfer to another Ohio School District, had 7 instances of improper support.</p> <p>3 - 48 Code, Expelled, had 3 instances which lacked an expulsion notice or other appropriate due process support.</p> <p>No files were provided for 5 students. For the 77 exceptions identified, 67 students had scores below 400 [does not meet State standards] on at least 1 section of the statewide Ohio Achievement Assessments.</p>
41.	044909	Toledo City	Leverette Elementary School	Lucas	73	55	One	<p>Refer to Section 10.3.2 of report.</p> <p>49 - 71 Code, Withdraw due to Truancy/Nonattendance, had 49 instances of improper support. No parental notification, no court ordered truancy. Additionally, of these students 42 did not appear to meet the 5/20 rule.</p> <p>4 - 41 Code, Transferred to another Ohio School District, had 4 instances of improper support.</p> <p>2 - Enrollment - 2 students for which supporting paperwork could be provided for the student being rolled up to the State due to mid-year enrollment.</p> <p>No files were provided for 7 students. For the 55 exceptions identified, 49 students had scores below 400 [does not meet State standards] on at least 1 section of the statewide Ohio Achievement Assessments.</p>
42.	044909	Toledo City	Rogers High School	Lucas	156	97	One	<p>Refer to Section 10.3.2 of report.</p> <p>89 - 71 Code, Withdraw due to Truancy/Nonattendance, had 89 instances of improper support. No parental notification, no court ordered truancy. Additionally, 79 of these students did not appear to meet the 5/20 rule.</p> <p>4 - 41 Code, Transferred to Another Ohio School District, had 4 instances of improper support, noting 2 of these students had transferred within the</p>

SCHOOLS WITH EVIDENCE OF SCRUBBING								
	District IRN	School District Name	School Name	County Name	Tested State Roll Up Students	Issues Identified (See Results for additional information)	AOS Testing Phase	Results
								<p>District.</p> <p>1 - 99 Code, Completed High School Graduation Requirements, had 1 instances of no support.</p> <p>3 - No files were provided for 3 students. Of these missing files, 1 was coded as 40, 1 was coded as 43, and 1 was coded as 71.</p> <p>For the 97 exceptions identified, 90 students had scores below 400 [does not meet State standards] on at least 1 section of the statewide Ohio Graduation Tests.</p>
43.	044909	Toledo City	Start High School	Lucas	235	169	One	<p>Refer to Section 10.3.2 of report.</p> <p>146 - 71 Code, Withdraw due to Truancy/Nonattendance, had 146 instances of improper support. No parental notification, no court ordered truancy. Additionally, 139 of these students did not appear to meet the 5/20 rule.</p> <p>1 - 40 Code, Transferred to School District outside of Ohio, had 1 instance of improper support.</p> <p>10 - 41 Code, Transferred to another Ohio School District, had 10 instances of improper support.</p> <p>1 - 42 Code, Transferred to a private school, had 1 instance of improper support.</p> <p>1 - 51 Code, Medical, had 1 instance of improper support.</p> <p>2 - 73 Code, above the age of 18, had 2 instances of improper support.</p> <p>6 - 99 Code, Completed High School Graduation Requirements, had 6 instances of improper support.</p> <p>2 - No reason - 2 students for which no reason or supporting paperwork could be provided for the student being rolled up to the State.</p> <p>No files were provided for 4 students.</p> <p>For the 169 exceptions identified, 120 students had scores below 400 [does not meet State standards] on at least 1 section of the statewide Ohio</p>

SCHOOLS WITH EVIDENCE OF SCRUBBING								
	District IRN	School District Name	School Name	County Name	Tested State Roll Up Students	Issues Identified (See Results for additional information)	AOS Testing Phase	Results
								Graduation Tests.
44.	044909	Toledo City	East Broadway Elementary School	Lucas	74	57	One	<p>Refer to Section 10.3.2 of report.</p> <p>47 - 71 Code, Withdraw due to Truancy/Nonattendance, had 47 instances of improper support. No parental notification, no court ordered truancy. Additionally, of these students 45 did not appear to meet the 5/20 rule.</p> <p>1 - 40 Code, Transferred to another School District outside of Ohio, had 1 instances which lacked appropriate support.</p> <p>3 - 41 Code, Transferred to another Ohio School District, had 3 instances of improper support.</p> <p>2 - 48 Code, Expelled, had 2 instances which lacked an expulsion notice or other supporting documentation indicating due process for expulsion.</p> <p>4 - Enrollment - 4 students for which supporting paperwork could be provided for the student being rolled up to the State due to mid-year enrollment.</p> <p>No files were provided for 11 students.</p> <p>For the 57 exceptions identified, 44 students had scores below 400 [does not meet State standards] on at least 1 section of the statewide Ohio Achievement Assessments.</p>
45.	044909	Toledo City	Byrnedale Middle School	Lucas	77	52	One	<p>Refer to Section 10.3.2 of report.</p> <p>46 - 41 Code, Transfer to another Ohio School District, had 46 instances of improper support.</p> <p>1 - 48 Code, Expelled, had 1 instance which lacked an expulsion notice or other appropriate due process support.</p> <p>2 - Enrollment - 2 students for which supporting paperwork could be provided for the student being rolled up to the State due to mid-year enrollment.</p> <p>3 - No reason - 3 students for which no reason or supporting paperwork could be provided for the student</p>

SCHOOLS WITH EVIDENCE OF SCRUBBING								
	District IRN	School District Name	School Name	County Name	Tested State Roll Up Students	Issues Identified (See Results for additional information)	AOS Testing Phase	Results
								<p>being rolled up to the State.</p> <p>No files were provided for 5 students.</p> <p>For the 52 exceptions noted, 37 students had scores below 400 [does not meet State standards] on at least 1 section of the statewide Ohio Achievement Assessments.</p>
46.	044909	Toledo City	McTigue Elementary School	Lucas	65	34	One	<p>Refer to Section 10.3.2 of report.</p> <p>33 - 71 Code, Withdraw due to Truancy/Nonattendance, had 33 instances of improper support. No parental notification, no court ordered truancy. Additionally, of these students 31 did not appear to meet the 5/20 rule.</p> <p>1 - Enrollment - 1 student for which supporting paperwork could be provided for the student being rolled up to the State due to mid-year enrollment.</p> <p>No files were provided for 4 students.</p> <p>For the 34 exceptions identified, 21 students had scores below 400 [does not meet State standards] on at least 1 section of the statewide Ohio Achievement Assessments.</p>
47.	043752	Cincinnati City	Rothenberg Preparatory Academy	Hamilton	30	12	Two	<p>Refer to Section 10.3.4 of this report.</p> <p>1 – Student was withdrawn with a subsequent re-enrollment noted as inactivated in error by the District. There was no enrollment form or other documentation to support the dates entered.</p> <p>11 - Students were primarily School to School transfers with minimal breaks in attendance and no other non-CPS school enrollments noted. These School to School transfers should not have caused students to be rolled up to the State results.</p>
48.	043752	Cincinnati City	Virtual High School	Hamilton	30	8	Three	<p>Refer to Section 10.3.4 of report.</p> <p>1 – Student coded as withdrawal under code 74 (Moved; not known to be continuing). However, documentation supports that the student should have been coded as code 41 (Transferred to another Ohio School District).</p> <p>1 – Student enrolled at Virtual High</p>

SCHOOLS WITH EVIDENCE OF SCRUBBING								
	District IRN	School District Name	School Name	County Name	Tested State Roll Up Students	Issues Identified (See Results for additional information)	AOS Testing Phase	Results
								<p>School, was withdrawn under code 40 (Transferred to another School District outside of Ohio) and re-enrolled into Virtual High School six days later. There was no documentation supporting the fact that the student had transferred to another School District outside of Ohio. The student was later withdrawn in FY '11 and enrolled in PACE High School (a non-CPS community school) for the remainder of the year. This withdrawal was properly made under code 41 (Transferred to another Ohio School District).</p> <p>1 – Student registered with Virtual on 11/15/10, but was coded as not newly enrolled in the school district. No evidence available to provide support that the student was enrolled at another school inside or outside Ohio prior to enrollment in Virtual High School.</p> <p>5 – Students were withdrawn under code 71, however the student was not included on the Court/Truancy Listing.</p>
49.	043786	Cleveland Municipal City	Scranton Elementary School	Cuyahoga	94	Refer to Section 10.3.3 of report.	Three	Refer to Section 10.3.3 of report.
50.	043786	Cleveland Municipal City	Mary B Martin Elementary School	Cuyahoga	63	Refer to Section 10.3.3 of report.	Three	Refer to Section 10.3.3 of report.
51.	043786	Cleveland Municipal City	Charles Dickens Elementary School	Cuyahoga	88	Refer to Section 10.3.3 of report.	Three	Refer to Section 10.3.3 of report.
52.	043786	Cleveland Municipal City	Paul Revere Elementary School	Cuyahoga	101	Refer to Section 10.3.3 of report.	Three	Refer to Section 10.3.3 of report.
53.	043786	Cleveland Municipal City	Marion C Seltzer Elementary School	Cuyahoga	112	Refer to Section 10.3.3 of report.	Three	Refer to Section 10.3.3 of report.
54.	043786	Cleveland Municipal City	H Barbara Booker Elementary School	Cuyahoga	100	Refer to Section 10.3.3 of report.	Three	Refer to Section 10.3.3 of report.
55.	043786	Cleveland Municipal City	Joseph M Gallagher Elementary School	Cuyahoga	143	Refer to Section 10.3.3 of report.	Three	Refer to Section 10.3.3 of report.
56.	043786	Cleveland Municipal City	Case Elementary School	Cuyahoga	90	Refer to Section 10.3.3 of report.	Three	Refer to Section 10.3.3 of report.
57.	043786	Cleveland Municipal City	Andrew J Rickoff Elementary School	Cuyahoga	90	Refer to Section 10.3.3 of report.	Three	Refer to Section 10.3.3 of report.
58.	043786	Cleveland	Orchard School	Cuyahoga	66	Refer to	Three	Refer to Section 10.3.3 of report.

SCHOOLS WITH EVIDENCE OF SCRUBBING								
	District IRN	School District Name	School Name	County Name	Tested State Roll Up Students	Issues Identified (See Results for additional information)	AOS Testing Phase	Results
		Municipal City				Section 10.3.3 of report.		
59.	043786	Cleveland Municipal City	McKinley Elementary School	Cuyahoga	62	Refer to Section 10.3.3 of report.	Three	Refer to Section 10.3.3 of report.
60.	043786	Cleveland Municipal City	Garrett Morgan School of Science	Cuyahoga	45	Refer to Section 10.3.3 of report.	Three	Refer to Section 10.3.3 of report.
61.	043786	Cleveland Municipal City	Charles A Mooney Elementary School	Cuyahoga	166	Refer to Section 10.3.3 of report.	Three	Refer to Section 10.3.3 of report.
62.	043786	Cleveland Municipal City	Patrick Henry Elementary School	Cuyahoga	77	Refer to Section 10.3.3 of report.	Three	Refer to Section 10.3.3 of report.
63.	043786	Cleveland Municipal City	Nathan Hale Elementary School	Cuyahoga	80	Refer to Section 10.3.3 of report.	Three	Refer to Section 10.3.3 of report.
64.	043786	Cleveland Municipal City	Willson Elementary School	Cuyahoga	91	Refer to Section 10.3.3 of report.	Three	Refer to Section 10.3.3 of report.
65.	043786	Cleveland Municipal City	Emile B Desauze Elementary School	Cuyahoga	50	Refer to Section 10.3.3 of report.	Three	Refer to Section 10.3.3 of report.
66.	043786	Cleveland Municipal City	Euclid Park Elementary School	Cuyahoga	67	Refer to Section 10.3.3 of report.	Three	Refer to Section 10.3.3 of report.
67.	043786	Cleveland Municipal City	Wilbur Wright Elementary School	Cuyahoga	116	Refer to Section 10.3.3 of report.	Three	Refer to Section 10.3.3 of report.
68.	043786	Cleveland Municipal City	Robert H Jamison Elementary School	Cuyahoga	78	Refer to Section 10.3.3 of report.	Three	Refer to Section 10.3.3 of report.
69.	043786	Cleveland Municipal City	Anton Grdina Elementary School	Cuyahoga	62	Refer to Section 10.3.3 of report.	Three	Refer to Section 10.3.3 of report.
70.	043786	Cleveland Municipal City	Paul L Dunbar Elementary School	Cuyahoga	44	Refer to Section 10.3.3 of report.	Three	Refer to Section 10.3.3 of report.
71.	043786	Cleveland Municipal City	George Washington Carver Elementary School	Cuyahoga	59	Refer to Section 10.3.3 of report.	Three	Refer to Section 10.3.3 of report.
72.	043786	Cleveland Municipal City	Luis Munoz Marin Elementary School	Cuyahoga	164	Refer to Section 10.3.3 of report.	Three	Refer to Section 10.3.3 of report.
73.	043786	Cleveland Municipal City	Woodland Hills School	Cuyahoga	65	Refer to Section 10.3.3 of report.	Three	Refer to Section 10.3.3 of report.
74.	043786	Cleveland Municipal City	Franklin D Roosevelt Elementary School	Cuyahoga	110	Refer to Section 10.3.3 of report.	Three	Refer to Section 10.3.3 of report.
75.	043786	Cleveland Municipal	Harvey Rice Elementary	Cuyahoga	69	Refer to Section 10.3.3	Three	Refer to Section 10.3.3 of report.

SCHOOLS WITH EVIDENCE OF SCRUBBING								
	District IRN	School District Name	School Name	County Name	Tested State Roll Up Students	Issues Identified (See Results for additional information)	AOS Testing Phase	Results
		City	School			of report.		
76.	043786	Cleveland Municipal City	Newton D Baker School of Arts	Cuyahoga	82	Refer to Section 10.3.3 of report.	Three	Refer to Section 10.3.3 of report.
77.	043786	Cleveland Municipal City	Adlai Stevenson Elementary School	Cuyahoga	51	Refer to Section 10.3.3 of report.	Three	Refer to Section 10.3.3 of report.
78.	043786	Cleveland Municipal City	Charles W Eliot Elementary School	Cuyahoga	86	Refer to Section 10.3.3 of report.	Three	Refer to Section 10.3.3 of report.
79..	043786	Cleveland Municipal City	Miles Park Elementary School	Cuyahoga	97	Refer to Section 10.3.3 of report.	Three	Refer to Section 10.3.3 of report.
80.	043786	Cleveland Municipal City	Design Lab High School	Cuyahoga	30	Refer to Section 10.3.3 of report.	Three	Refer to Section 10.3.3 of report.
81.	043786	Cleveland Municipal City	Carl & Louis Stokes Central Academy	Cuyahoga	99	Refer to Section 10.3.3 of report.	Three	Refer to Section 10.3.3 of report.
82.	043786	Cleveland Municipal City	James Ford Rhodes High School	Cuyahoga	276	Refer to Section 10.3.3 of report.	Three	Refer to Section 10.3.3 of report.
83.	043786	Cleveland Municipal City	Kenneth W Clement Elementary School	Cuyahoga	29	Refer to Section 10.3.3 of report.	Three	Refer to Section 10.3.3 of report.
84.	043786	Cleveland Municipal City	Artemus Ward Elementary School	Cuyahoga	73	Refer to Section 10.3.3 of report.	Three	Refer to Section 10.3.3 of report.
85.	043786	Cleveland Municipal City	Louis Agassiz Elementary School	Cuyahoga	54	Refer to Section 10.3.3 of report.	Three	Refer to Section 10.3.3 of report.
86.	043786	Cleveland Municipal City	Union Elementary School	Cuyahoga	40	Refer to Section 10.3.3 of report.	Three	Refer to Section 10.3.3 of report.
87.	043786	Cleveland Municipal City	Washington Park High School	Cuyahoga	22	Refer to Section 10.3.3 of report.	Three	Refer to Section 10.3.3 of report.
88.	043786	Cleveland Municipal City	Watterson-Lake Elementary School	Cuyahoga	63	Refer to Section 10.3.3 of report.	Three	Refer to Section 10.3.3 of report.
89.	043786	Cleveland Municipal City	Max S Hayes High School	Cuyahoga	68	Refer to Section 10.3.3 of report.	Three	Refer to Section 10.3.3 of report.
90.	043786	Cleveland Municipal City	Hannah Gibbons- Nottingham Elementary School	Cuyahoga	36	Refer to Section 10.3.3 of report.	Three	Refer to Section 10.3.3 of report.
91	043786	Cleveland Municipal City	Giddings	Cuyahoga	46	Refer to Section 10.3.3 of report.	Three	Refer to Section 10.3.3 of report.
92.	043786	Cleveland Municipal City	Michael R White Elementary School	Cuyahoga	72	Refer to Section 10.3.3 of report.	Three	Refer to Section 10.3.3 of report.
93.	043786	Cleveland Municipal City	Captain Arthur Roth Elementary	Cuyahoga	47	Refer to Section 10.3.3 of report.	Three	Refer to Section 10.3.3 of report.

SCHOOLS WITH EVIDENCE OF SCRUBBING								
	District IRN	School District Name	School Name	County Name	Tested State Roll Up Students	Issues Identified (See Results for additional information)	AOS Testing Phase	Results
			School					
94.	043786	Cleveland Municipal City	Mary M Bethune Elementary School	Cuyahoga	60	Refer to Section 10.3.3 of report.	Three	Refer to Section 10.3.3 of report.
95.	043786	Cleveland Municipal City	East Clark Elementary School	Cuyahoga	63	Refer to Section 10.3.3 of report.	Three	Refer to Section 10.3.3 of report.
96.	043786	Cleveland Municipal City	Wade Park Elementary School	Cuyahoga	50	Refer to Section 10.3.3 of report.	Three	Refer to Section 10.3.3 of report.
97.	043786	Cleveland Municipal City	MC2 STEM High School	Cuyahoga	28	Refer to Section 10.3.3 of report.	Three	Refer to Section 10.3.3 of report.
98.	043786	Cleveland Municipal City	Clara E Westropp Elementary School	Cuyahoga	71	Refer to Section 10.3.3 of report.	Three	Refer to Section 10.3.3 of report.
99.	043786	Cleveland Municipal City	Clark School	Cuyahoga	59	Refer to Section 10.3.3 of report.	Three	Refer to Section 10.3.3 of report.
100.	043786	Cleveland Municipal City	Ginn Academy High School	Cuyahoga	37	Refer to Section 10.3.3 of report.	Three	Refer to Section 10.3.3 of report.
101.	043786	Cleveland Municipal City	Robinson G Jones Elementary School	Cuyahoga	56	Refer to Section 10.3.3 of report.	Three	Refer to Section 10.3.3 of report.
102.	043786	Cleveland Municipal City	New Tech East High School	Cuyahoga	11	Refer to Section 10.3.3 of report.	Three	Refer to Section 10.3.3 of report.
103.	044909	Toledo City	Fulton/Kobacker at Robinson	Lucas	14	9	Three	Refer to Section 10.3.2 of report. 8 - 71 Code, Withdraw due to Truancy/Nonattendance, had 8 instances of improper support. No parental notification, no court ordered truancy. Additionally, of these students 3 did not appear to meet the 5/20 rule. 1 - 72 Code, Pursued Employment/Work Permit, 1 instance which lacked support. No evidence of work permit or Superintendent approval on file. For the 9 exceptions identified, 7 students had scores below 400 [does not meet State standards] on at least 1 section of the statewide Ohio Achievement Assessments.
104.	044081	Winton Woods City	Winton Woods High School, Winton Woods Middle School, Winton Woods Intermediate	Hamilton	245	74	Three	Refer to Section 10.3.9 of report. 74 – The district retroactively modified student attendance transactions for 74 students with improper supporting documentation.

12.2. SCHOOLS WITH ERRORS

The following table describes the schools with less pervasive errors in enrollment identified during the 2010-11 school year. For purposes of this report, “errors” are defined as sporadic exceptions including, but not limited to, a lack of documentation, missing student files, and incorrect or unsubstantiated EMIS withdraw codes.

SCHOOLS WITH ERRORS								
	District IRN	School District Name	School Name	County Name	Tested State Roll Up Students	Issues Identified (See Results for additional information)	AOS Testing Phase	Results
1.	043489	Akron City	Akron Opportunity Center	Summit	24	6	One	<p>2 - Withdrawn to homeschooling; however, the students should not have been withdrawn because they were on home instruction.</p> <p>1 - There should not have been a break in attendance. The student was enrolled at AOC, sent to the Phoenix Program at the YMCA, then came back to AOC.</p> <p>1 - The student never showed up for school and was withdrawn for truancy. However, the District could not provide documentation that the student was referred to the Office of Student Services, the District truancy letters to the student (required by policy), or filed a complaint in juvenile court. Additionally, the student was re-enrolled into the District at a later date, but no enrollment form could be provided.</p> <p>1 - The student was withdrawn on 10/25/10 using withdrawal code "45" (transferred by court order to correctional facility) and reenrolled in the District on 11/15/10. Per inquiry of the Director of Student Services, the withdrawal on 10/25/10 was a mistake, as the student was still a resident and responsibility of the District.</p> <p>1 - The student was listed as being expelled on 5/5/11; however, per the discipline record, the student was enrolled in an alternative program, and should not have been withdrawn from the District.</p>
2.	043489	Akron City	North High School	Summit	75	2	One	1-The student attended North until 10/5/10. The Entry Withdrawal List indicated the student withdrew to another district (a notation of

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								<p>""w/d to Berea"" was made); however, no supporting documentation could be provided that the student actually withdrew to another district. The detail attendance records in the E-School Plus system did support the student was not in attendance at the District after the withdrawal date.</p> <p>1-The student attended North until 3/7/11. The Entry Withdrawal List indicated the student withdrew to a district out of state (a notation of w/d to Armarillo, Tx was made); however, no supporting documentation existed to indicate the student withdrew out of State. Additionally, the notation did not indicate who the person withdrawing the student talked to, if it was a phone call or face to face, the date/time, etc. The detailed E-School Plus System attendance records supported the student did not attend the District after 3/7/11.</p>
3.	046623	Ansonia Local	Ansonia High School	Darke	27	11	One	<p>6- The EMIS coordinator maintained a correspondence file with Districts asking for transcripts and her information on faxing/mailing the information for 6 of these students, however this file was thrown away after the school year.</p> <p>4-Students did not have files, but per conversation with the EMIS coordinator and Superintendent it was noted that one was a migrant worker's child from Texas, another one was enrolled in the County Alternative school due to kidney issues, one other child was special education and just stopped showing up and another one was foster placed to another District.</p> <p>1-Student was included on an open enrollment sheet but had no file or application supporting such open enrollment.</p>
4.	045229	Bradford Exempted Village	Bradford High School	Miami	56	1	One	<p>1 - Student with severe disabilities had very little in school file to support withdrawal. Auditor obtained support from outside source. Withdrawal appears</p>

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								accurate, but support was not on file at school.
5.	043844	Dayton City	Meadowdale High School	Montgomery	76	9	One	<p>3-The students were not withdrawn from the District during the 2010-2011 school year. Two of the students were detained by the Montgomery County Juvenile Court, however, the students weren't detained until 6/5/2011 and were only detained for 4 days (1 school day). The third student was detained by the Montgomery County Juvenile Court, however, the student wasn't detained until 5/31/2011 and was only detained for 9 days (5 school days).</p> <p>2-The students were withdrawn from the District during the 2010-2011 school year for expulsion, however, the students were not actually expelled from the District. The student were placed at the District's alternative school and should not have been withdrawn from the District.</p> <p>1-The student was placed at Paint Creek Academy via the Court and committed to the legal custody of the Department of Youth Services for Institutionalization. The Court ordered the Dayton Public Schools responsible for the cost of education for the child. The proper withdrawal code for transferred by Court Order/Adjudication is 45, however since the student was placed into the Department of Youth Service the student should not have been withdrawn from the District and the WKC code should not be 04.</p> <p>2-Lack of support to support the attendance event.</p> <p>1-The student was not withdrawn from the District during the 2010-2011 school year, however, the student did transfer to the District's alternative school. Thus, the 04 WKC code does not appear appropriate as the student was enrolled at the District for the full academic year.</p>

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	District IRN	School District Name	School Name	County Name	Tested State Roll Up Students	Issues Identified (See Results for additional information)	AOS Testing Phase	Results
6.	044107	Hamilton City	Garfield Middle School	Butler	105	6	One	<p>5 - Out of School Suspensions that do not result in a break in attendance; students should not have been rolled up to the State.</p> <p>1 - Student noted as an expulsion had no discipline code entered per review of data file from ODE. Per review of DASL information, noted student shown as expelled from 3/3/11 through 3/9/11 (6 days). This appears to represent an Out of School Suspension and not an expulsion; therefore, student should not have been rolled up to the State.</p>
7.	044107	Hamilton City	Hamilton Education Center	Butler	88	23	One	<p>20 - Students without any supporting documentation in file.</p> <p>1 - Out of School Suspensions that do not result in a break in attendance; students should not have been rolled up to the State.</p> <p>2 - Alternative placement in the District's 10+10 Program which is an on-line option at home of the District's alternative program. However, such home instruction does not support a break in attendance.</p>
8.	044107	Hamilton City	Hamilton High School	Butler	228	52	One	<p>47 - Students without any supporting documentation in file.</p> <p>5 - Out of School Suspensions that do not result in a break in attendance; students should not have been rolled up to the State.</p>
9.	048686	Jefferson Township Local	Jefferson High School	Montgomery	34	2	One	<p>2 - Supporting documentation not included in file or file was missing, according to EMIS coordinator, individual at the school who did enrollment and withdrawal documentation is no longer at the school and some records were not maintained.</p>
10.	044222	Lima City	Lima Alternative	Allen	25	3	One	<p>3 - No support for 2 truancy withdrawals and 1 withdrawal for completing graduation requirements.</p> <p>There were also 4 students over 18 with no support. However, this is an alternative school with mostly students that are over the age of</p>

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	District IRN	School District Name	School Name	County Name	Tested State Roll Up Students	Issues Identified (<i>See Results for additional information</i>)	AOS Testing Phase	Results
								18. It is not always possible to get a withdrawal notice. Most of the time the students just stop coming. For those events coded as "over 18", auditor confirmed student was over 18 based on system recorded birth date. These 4 were not included as exceptions.
11.	044263	Lorain City	New Beginnings	Lorain	61	7	One	<p>2-Student files did not have documentation indicating the student was expelled from school as of the withdrawal date indicated.</p> <p>2-Student files did not have documentation indicating they were registered/ enrolled.</p> <p>3-Student files that the EMIS Coordinator could not locate. For these 3 students, the EMIS Coordinator provided AOS with other supporting documentation that student was not enrolled in the district for the full year such as: 1) eSMOC Ohio Report Card for the student which indicated that the student was not enrolled in the district for the full year as noted by grading period(s) missing for the 1st, 2nd or 3rd quarter. AOS also noted in most cases student grades were favorable. 2) documentation that student was expelled; and 3) student registration documentation. These 3 students were included within the failures due to the fact that student files could not be located.</p>
12.	044263	Lorain City	General Johnnie Wilson Middle School	Lorain	55	6	One	<p>3-The EMIS Coordinator was unable to locate 3 student files. To determine the student was properly included in our report, the EMIS Coordinator obtained the eSMOC Ohio Report Card for the student which indicated that the student was not enrolled in the district for the full year as noted by grading period(s) missing for the 1st, 2nd or 3rd quarter. In most cases student grades were favorable.</p> <p>3-We noted 3 student files that lacked documentation that the students were enrolled in autism scholarship program.</p>

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	District IRN	School District Name	School Name	County Name	Tested State Roll Up Students	Issues Identified (See Results for additional information)	AOS Testing Phase	Results
13.	044263	Lorain City	Longfellow Middle School	Lorain	44	5	One	5 - The EMIS Coordinator was unable to locate 5 student files. To determine the student was properly included in our report, the EMIS Coordinator obtained the eSMOC Ohio Report Card for the student which indicated that the student was not enrolled in the district for the full year as noted by grading period(s) missing for the 1st, 2nd or 3rd quarter. In most cases student grades were favorable.
14.	044297	Mansfield City	Mansfield Integrated Learning Center, Hedges Campus	Richland	13	2	One	1-Student at Mansfield High School transferred in - it appears that he changed Schools during the year, however, he did not attend school outside of the district . No support for an attendance event that would have rolled the student's scores to the State. 1-We examined attendance records indicating that the student attended outside the district from 8/25/10 – 9/7/10. However, this was prior to count week so this would not cause a student's scores to be rolled to State. The student also moved between district Schools. However, no support for an event that would have rolled the student's scores to the State.
15.	044461	New Boston Local	Oak Intermediate Elementary School	Scioto	28	1	One	1 - Student has been in and out of system since 2008 - no support for attendance event. Also identified 19 instances whereby no enrollment/ withdrawal form was present; however other documentation was maintained in student file to support attendance event.
16.	044479	New Lexington City	New Lexington High School	Perry	73	1	One	1 - No student file or documentation supporting the student's withdrawal could be obtained for audit. Additionally, of the 73 students tested, 25 withdrawals were noted for which there was no completed Withdrawal Report within the student file and 28 enrollments were noted for which there was no completed Student Registration Form within the student file. Other

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								documentation was available and reviewed pertaining to correspondence between districts to support the student was properly coded and rolled up to the State.
17.	044453	Newark City	Heritage Middle School	Licking	76	2	One	<p>2 - Nothing to support attendance event.</p> <p>Additionally, there were instances where no forms were in the files but other support was included to support the event.</p>
18.	044453	Newark City	Newark High School	Licking	247	65	One	<p>38-Purged files: Meaning, student either graduated or reached age that they can't attend H.S. (within the past 2 years). Everything except transcripts, test scores, IEPs, and medical information are removed. No withdrawal, enrollment forms or records requests are kept. The purge is based on a District practice/policy put in place by an ex-asst. superintendent. We confirmed that file was purged based on District criteria.</p> <p>13-Nothing to support the attendance event in the student file.</p> <p>5-No "cum file". Newark is home District, student is elsewhere and has never attended District.</p> <p>4-Student has file, but not enough information to support enrollment during the year.</p> <p>5-Student was 18 and withdrawn (code 73) due to nonattendance. No withdrawal support in file, confirmed student was 18, no further attendance noted after withdrawal date.</p> <p>There were additional files with lack of forms but other support was available to support the attendance event.</p>
19.	044677	Princeton City	Princeton High School	Hamilton	170	5	One	<p>5 - Students coded as 71 with no court truancy documentation. Each of these 5 students that did not have corresponding court truancy documentation were over the age of 18 and should have been coded</p>

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								as 73 rather than 71.
20.	047001	Reynoldsburg City	Baldwin Road Junior High School	Franklin	46	1	One	1 - Student file could not be located.
21.	044784	Sidney City	Sidney High School	Shelby	176	42	One	19-No support for attendance event. 23 – The attendance event code reported to the State for the attendance event was incorrect.
22.	048694	Trotwood- Madison City	Trotwood- Madison Elementary	Montgomery	68	9	One	1-Student classified as WKC Code 12 - first year LEP student but enrolled for several years. 1-Student excluded due to withdrawal, however per supporting documentation the student did not have a break in attendance during the 2010-11 school year and should have been included on the school's report card. 7-Students excluded due to expulsion. Student was expelled for 10 or less days therefore this would appear to represent a suspension and he/she should have been included in the District's report card. Additionally, for Trotwood-Madison Elementary, 6 students were noted for which a withdrawal form or request for records were not included within the student file. Other documentation was available to support the attendance event.
23.	048694	Trotwood- Madison City	Trotwood- Madison Middle School	Montgomery	87	6	One	3 - Students with an event code of expulsion, was expelled for 10 or less days therefore this would appear to represent a suspension and he/she should have been included in the District's report card. 1- Student with an event code of expulsion, was expelled for 10 or less days therefore this would appear to represent a suspension and he/she should have been included in the District's report card. AND the expulsion notice documented an expulsion date at or near the end of the school year;

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								<p>however, the withdrawal date was back-dated to a date prior to the end of the Full Academic Year, which is May 10th for grades 3-8. No documentation as to why the date of the actual withdrawal varied from the expulsion date per the expulsion notice.</p> <p>2-Students had an event code of expulsion. The expulsion notice documented an expulsion date at or near the end of the school year; however, the withdrawal date was back-dated to a date prior to the end of the Full Academic Year, which is May 10th for grades 3-8. No documentation as to why the date of the actual withdrawal varied from the expulsion date per the expulsion notice.</p> <p>Additionally, for Trotwood-Madison Middle School, 4 students were noted for which a enrollment form, withdrawal form or request for records were not included within the student file. Other documentation was available to support the attendance event.</p>
24.	048694	Trotwood-Madison City	Madison Park Elementary	Montgomery	47	1	One	<p>1-Student excluded due to expulsion. Student was expelled for 10 or less days therefore this would appear to represent a suspension and he/she should have been included in the District's report card.</p> <p>Additionally, for Madison Park Elementary, 3 students were noted for which a withdrawal form or request for records were not included within the student file. Other documentation was available to support the attendance event.</p>
25.	045005	Warrensville Heights City	Eastwood Elementary School	Cuyahoga	50	3	One	<p>3 - Lack of district transfer forms. However, additional support was provided to determine the students were transferred appropriately.</p>
26.	045096	Willard City	New Haven Elementary School	Huron	37	3	One	<p>1 - Nothing on file to support the attendance events.</p> <p>2 - Noted that documentation supported withdrawal date but not code. One student was improperly</p>

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	District IRN	School District Name	School Name	County Name	Tested State Roll Up Students	Issues Identified (See Results for additional information)	AOS Testing Phase	Results
								coded as moving to another district out of state, 40, when documentation states student transferred outside of the United States, code 46. Another student had no truancy paper work to support code 71.
27.	045096	Willard City	Willard Middle School	Huron	112	3	One	2-Nothing on file to support the attendance event. 1-Noted that documentation supported withdrawal date but not code. Student was improperly coded as moving to another district in State, 40, when documentation shows student moving out of state, 41.
28.	045096	Willard City	Willard High School	Huron	70	1	One	1-Noted that documentation supported withdrawal date but not code. Student was improperly coded as moving to another district out of state, 41, but court documents state student is no longer required to attend school and is not known to be continuing. Should be code 74.
29.	045161	Youngstown City	University Project Learning Center (UPLC)	Mahoning	21	5	One	1-We reviewed a Student Withdrawal/Record Transfer Form dated 9/29/10 stating the student withdrew; however, no withdrawal date was provided and the form was not signed by anyone. We reviewed a letter from the Supervisor of Student Services to the Principal dated 10/27/10 stating the student should be re-enrolled at UPLC. However, no documentation was found officially re-enrolling the student. We reviewed a Student Withdrawal/Record Transfer Form dated 5/9/11 stating the student withdrew; however, no withdrawal date was provided and the form was not signed by anyone. The form was initialed stating the student withdrew on 5/5/11 under code 41. There is no documentation stating where the student transferred to. We spoke to the Supervisor Of Student Services regarding the status of the student and she explained that the District has no proof that the student has been re-enrolled at another school; therefore, the student is considered an ongoing

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								<p>truancy case, which is currently being handled by the courts. We also asked the District if they normally recode the student upon finding out that the student never re-enrolled in another school and they stated that they kept code 41, since eventually the courts will force the child to re-enroll at another school or return to UPLC. Due to the fact the student is an ongoing truancy, it would be more accurate to code the student with code 71 (Withdrew due to truancy/nonattendance) while maintaining appropriate evidence of due process.</p> <p>1- We reviewed Attendance Summary, noting the student started on home instruction on 12-15-10. No supporting documentation noting this was court mandated. Therefore, it is indeterminable if the withdrawal code of 45 is appropriate;</p> <p>1-We reviewed Student Withdrawal/Record Transfer Form dated 2/4/11 stating the student was withdrawn. The form was signed by the Principal on 1/9/10 and the Director of Pupil Personnel. The student had unexcused absences from 12/9/10 until the date of the Withdrawal/Record Transfer Form. This may explain why the Withdraw Date reflected on this spreadsheet shows 12/9/10. We reviewed the Admission/Withdraw Maintenance print screen from the system, which noted the student was admitted to UPLC on 3/19/10 and withdrew on 12/9/10 (Code 41 - Tran-PSD in Ohio). The sheet also noted that her next school was the MCESC PACE Program; however there is no additional documentation to support the claim. We spoke to the Supervisor Of Student Services regarding the student's status after leaving UPLC and she said the District has no record of the student after she withdrew from UPLC. We also asked her about</p>

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	District IRN	School District Name	School Name	County Name	Tested State Roll Up Students	Issues Identified (See Results for additional information)	AOS Testing Phase	Results
								<p>seeing the MCESC PACE Program on the Admission/Withdraw Maintenance print screen and she said that if she did indeed enroll in the PACE Program, she would have had to enroll at one of the other public school districts in Mahoning County; however, YCSD has no record of her re-enrolling, nor is there proof of her participating in the MCESC PACE Program.</p> <p>2- There was no documentation supporting inter-district enrollment, only intra-district transfer; therefore, no evidence supporting</p> <p>As such, a correct coding cannot be determined without knowing what happened to the student after she withdrew from UPLC.</p> <p>2- There was no documentation supporting inter-district enrollment, only intra-district transfer; therefore, no evidence supporting students' mid-year enrollment and roll to the State.</p>
30.	045161	Youngstown City	P. Ross Berry Middle School	Mahoning	57	4	One	4 - Student files did not include documentation to support the noted enrollment date during the FY '11 academic year.
31.	045161	Youngstown City	Volney Rogers Junior High School	Mahoning	52	3	One	<p>1-We viewed the Admission/Withdraw Maintenance Form showing the student was enrolled during the school year, however, there is no Registration Form on file or Record Request Form from the previous school.</p> <p>1-Beginning 11/16/09, the student was on Health Impaired Home Instruction. No documentation showing the admission to Leonard Kirtz in August of 2010, except for the Admission/Withdraw Maintenance Screen.</p> <p>1-The student stopped attending school effective 3/21/11 due to nonattendance. No transfer or Withdrawal forms noted. Attendance Summary ended at 3/21/11. Per Release of School</p>

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								Records form, student enrolled with P. Ross Berry to start the 2011-12 school yr. Admission date was 8/31/11 withdrawal reason should have been 71, nonattendance after appropriate due process. Withdrawal code of 41 appears inappropriate.
32.	045161	Youngstown City	Youngstown East High School	Mahoning	77	28	One	<p>1 - The student file could not be located and there was no explanation as to why the file was missing.</p> <p>4-The students were open enrolled and never attended YCSD and no files were available for review.</p> <p>1-The student left the District pursuant to Court Order - however, documentation of the Court Order was not available for review.</p> <p>18-The student was improperly coded with withdrawal code of 41 yet there was no evidence of the student transferring to another Ohio school district and in many cases the transferring district was marked as "unknown" and the student had stopped attending. In other cases, the student was noted as over the age of 18 and should have been coded as 73 rather than 41.</p> <p>4-There was no documentation within the student file to support the noted attendance event.</p>
33.	043489	Akron City	Akron Alternative Academy	Summit	30	3	Two	<p>2 - Students withdrawn under EMIS code "71" (truancy), did not have adequate documentation to support the students due process rights were followed for withdrawal due to truancy, in accordance with District policy. No truancy referral was made to the Office of Student Services, no chronic, habitual, or 20+ day (of unexcused absences) letters could be produced by the District, no other documentation indicating the District contacted the parents or student to discuss the truancy could be obtained, and no complaint was filed in Juvenile court. We did obtain the "Student Audit Trail Summary" report from</p>

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								<p>the eSchool Plus system, noting the student was absent 20 or more days, which meets the District's policy for referring the student to the Office of Student Services for removal due to truancy.</p> <p>1 - Student tested as withdrawn under EMIS code "40" (transferred to another district outside of Ohio) did not have adequate supporting documentation. The "Entry/Withdrawal List" from the eSchool Plus system indicated the student withdrew to Kennefaw, GA; however, in the comments section of the eSchool Plus system, it does not indicate how the District arrived at this conclusion (if any documentation was received by the School, if a parent/guardian was contacted by phone, when the parent/guardian was contacted, etc.). Additionally, no request for release of records from a Kennefaw, GA school or a release of records from the District was on file. The District should maintain adequate documentation to support a withdrawal to another District, which could include a request for release of records from the district the student was transferring to, a records release form from the District, a phone log (or comments section in the eSchool Plus system) which indicates specific details about how the District was informed the student transferred to another district, who the District talked to, when the District talked to the person, and any other pertinent details.</p> <p><i>Additional Issue Noted During Testing:</i> The District's policy for withdrawing students under EMIS code "73" (over the age of 18) is defined in the Student Support Services and Security Manual, in the policy "Removal from the Rolls as Overage". The policy indicates a student over the age of 18 may be withdrawn for excessive absences.</p>

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								Students are not to be withdrawn until the Attendance Coordinator (from the Office of Student Services through a referral process) returns an action sheet authorizing the withdrawal as overage. Any student withdrawn improperly must be placed back on the school roll. Additionally, in the Student Support Services and Security Manual policy "Truancy Referral Procedures," the policy indicates no referrals to the Office of Student Services for attendance will be made for students over the age of 17 ½. The policies for "Truancy Referrals" and "Removal from the Rolls as Overage" contradict each other. We noted no referrals were made to the Office of Student Services for 12 students that were tested as withdrawn under EMIS code "73".
34.	001149	Athens City	Athens High School	Athens	30	4	Two	4 – Improper withdraw codes based on student file documentation.
35.	043638	Bowling Green Local	Ridge Elementary	Wood	15	1	Two	1 – The student was coded as withdrawing under code "46" (transferred out of the United States). There was no documentation in the student's file supporting a withdrawal and moving out of the Country. We did see documents showing the student originally came from Canada to the US. Per EMIS Coordinator, parents never came in to formally withdraw student, students just never returned to the district.
36.	047829	Centerburg Local	Centerburg Middle School	Know	9	3	Two	2 - No admission form in file or records release request was noted in the file to support admission date. 1 - No documentation was maintained that the student withdrew. However, able to confirm student was home schooled from list provided by Knox County Educational Service Center.
37.	043737	Centerville City	Normandy Elementary School	Montgomery	27	11	Two	1 - The District was not able to provide AoS with support that this student was an LEP student. AoS was not able to verify that the WKC code for this student was correct. This student has been in the US for several years but was excluded

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								<p>from the District's report card with WKC code 12 - LEP students in US schools for the first time on or after the first day of the current school year.</p> <p>4 - The District was not able to provide an enrollment form completed and signed by a parent nor were they able to provide a Request for Records for records requested from the prior district.</p> <p>6 - The District was not able to provide a withdrawal form completed and signed by a parent nor were they able to provide a Request for Records from the receiving district.</p>
38.	047027	Dublin City	Daniel Wright Elementary School	Franklin	30	3	Two	<p>1 – The withdrawal code used was 74 (Moved not known to be continuing), however, the District received records request from new school during the school year; therefore, the District should have updated withdrawal code to 41 (transferred to another Ohio School District Local, Exempted Village, or City, transcript request on file)</p> <p>1 – Withdrawal code used was 42 (transferred to a private school, transcript request on file) for a student who transferred to a school that is in a Public School System; therefore, withdrawal code 41 (transferred to another Ohio School District Local, Exempted Village, or City, transcript request on file) should have been used.</p> <p>1 – Withdrawal code used was 40 (transferred to another school district outside of Ohio, transcript request on file) for a student who actually transferred outside the United States; therefore, withdrawal code 46 (transferred out of the United States) should have been used.</p>
39.	047027	Dublin City	Indian Run Elementary School	Franklin	27	2	Two	<p>2 – The withdrawn code used was 74 (Moved not known to be continuing), however, the District received records request from new school; therefore, the District should have updated withdrawn</p>

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	District IRN	School District Name	School Name	County Name	Tested State Roll Up Students	Issues Identified (<i>See Results for additional information</i>)	AOS Testing Phase	Results
								code to 41 (transferred to another Ohio School District Local, Exempted Village, or City, transcript request on file).
40.	002824	Jefferson Township Local	Blairwood Elementary School	Montgomery	21	4	Two	<p>2 - Student files could not be located.</p> <p>1 - Student with no withdrawal paperwork contained in file to support withdrawal date or code.</p> <p>1 - Student with DASL paperwork contained in file indicating that student is a resident foster placed elsewhere full time effective 7/1/10. However, no supporting documentation contained in file to support withdrawal. Additional DASL paperwork indicating the student is attending ESC full time effective 1/3/11. However, no supporting documentation contained in file to support withdrawal.</p>
41.	044222	Lima City	Liberty Arts Magnet k-8	Allen	14	2	Two	2 - Students who attend Marimor moved from Delphos to Lima City. They never attended Lima City, per inquiry with the EMIS coordinator. There was no paperwork in student files to support dates, this is usually done with a phone call.
42.	044222	Lima City	Lima South Science-Technology Magnet K-8	Allen	30	1	Two	1 - Student file was selected which contained no support for the students re-enrollment in the district
43.	044222	Lima City	Progressive Academy	Allen	30	1	Two	1 - Per EMIS coordinator, they don't get documentation when a student goes to the adult jail. Per the EMIS coordinator, code 45 and 48 are next to each other and just entered the wrong code.
44.	044263	Lorain City	Academic Enrichment Academy	Lorain	30	6	Two	6 – Student files that could not be located.
45.	044420	Mount Vernon City	Pleasant Street Elementary	Knox	25	3	Two	<p>1 - Noted that documentation supported withdrawal date but not code. Student was improperly coded as moving to another district in state, 41, when documentation shows student moving out of state, 40.</p> <p>1 – Noted record request from another district in Ohio that did not include date to support the withdrawal date.</p>

SCHOOLS WITH ERRORS								
	District IRN	School District Name	School Name	County Name	Tested State Roll Up Students	Issues Identified (See Results for additional information)	AOS Testing Phase	Results
								<p>1 – Noted student re-enrolled in district after attending digital academy but no admission forms were completed.</p> <p>There were eight files whereby no withdrawal form was present; however other documentation was maintained in file to support the attendance event.</p>
46.	044594	Oberlin City	Oberlin High School	Lorain	20	1	Two	1 - Student rolled up was enrolled at JVS however this was not an open enrolled JVS; therefore, the JVS student should not have been withdrawn.
47.	49213	Rootstown Local	Rootstown	Portage	24	1	Two	1 - No documentation in student file indicating student withdrew from Rootstown Elementary to be homeschooled.
48.	045054	West Carrollton City	West Carrollton High School	Montgomery	30	1	Two	1 - Student file had no evidence in the file indicating that the student withdrew. There was also no indication that the school attempted to locate the student
49.	046359	West Clermont Local	Holly Hill Elementary	Clermont	23	1	Two	1 – There was no enrollment form or other documentation for school year 2010-2011 to support enrollment.
50.	046060	Western Brown Local	Hamersville Elementary	Brown	30	1	Two	1 - Coding error, code used was 43 and should have been 41.
51.	046060	Western Brown Local	Western Brown High School	Brown	30	8	Two	<p>2 – No support for code 41 (transfer to another school). However, student was over 18 and stopped attending and a code 73 would have been appropriate and resulted in the student appropriately rolled up to the State.</p> <p>2 – Withdrawal support on file but dates did not match date of withdrawal.</p> <p>1 – Incorrectly coded as an admission, there was withdrawal support in file that would have supported a withdrawal.</p> <p>1-No support for transfer to ECOT included in the file.</p> <p>2 – No documentation in file, either not maintained or student file was purged.</p>
52.	045096	Willard City	Richmond Elementary	Huron	14	1	Two	1 – Student withdrawn 11/08/10 using withdrawal code “40”

SCHOOLS WITH ERRORS								
	District IRN	School District Name	School Name	County Name	Tested State Roll Up Students	Issues Identified (<i>See Results for additional information</i>)	AOS Testing Phase	Results
			School					(Transferred to Another School District Outside of Ohio). Documentation could not be located supporting student withdrawal. Discussion with the EMIS Coordinator indicated student was part of migrant services and it is believed parents moved without notifying the District. Student was withdrawn after a number of consecutive days absent and failed attempts to contact parents (was not deemed truant).
53.	045138	Worthington City	Brookside Elementary	Franklin	8	1	Two	1 – The student was withdrawn on 4/15/11 using withdrawal code “46” (transferred out of the United States). Per review of the student’s file, there was no documentation to support that the student left the country.
54.	045138	Worthington City	Worthington Park Elementary	Franklin	40	7	Two	2 – The District was unable to locate the student files. 3 – Withdrawn due to transfer to a private school (code “42”), however, records requests from subsequent schools indicated they transferred to other Ohio public schools. 1 – There was no support for the enrollment date in the student’s file. 1 – The student was withdrawn on 9/9/10 using the withdrawal code “74” (moved – not known to be continuing), however, a records request in the student file indicated the student transferred to another Ohio public school.
55.	045161	Youngstown City	Youngstown Virtual Academy	Mahoning	35	15	Two	6 - Adequate supporting documentation was not available in the Student files to support the WKC and Withdrawal codes. 9 - Students were withdrawn for lack of participation which is required in this type of program. However, the code used was 41 (transfer to another Ohio school). There was no evidence the student transferred to another Ohio school. There was also no evidence the district followed up with these students to determine

SCHOOLS WITH ERRORS								
	District IRN	School District Name	School Name	County Name	Tested State Roll Up Students	Issues Identified (See Results for additional information)	AOS Testing Phase	Results
								truancy.
56.	043844	Dayton City	Gardendale Academy	Montgomery	26	2	Three	<p>1-Student shown as enrolled during the FY11 school year with no support (enrollment form, records request, etc.).</p> <p>1- Student shown as withdrawn during the FY11 school year with no support (withdrawal form, request for records, etc.).</p>
57.	044677	Princeton City	Princeton Virtual Academy	Hamilton	16	3	Three	<p>2-Students for which the wrong code was used. The students were over the age of 18 at the time of withdrawal and code 73 should have been used rather than code 71.</p> <p>1-Student excluded due to expulsion. Student was expelled for 10 or less days therefore this would appear to represent a suspension and he/she should have been included in the District's report card.</p>
58.	044818	Springfield City School District	Keifer Alternative School	Clark	30	1	Three	<p>1-Student did not have enrollment/withdrawal forms on file. No additional support existed beyond information in their SIS system.</p> <p>We also noted 6 students that did not have enrollment/withdrawal forms on file. However, other documentation existed at the school to support the break in attendance so these were not considered failures.</p>

12.3. CLEAN SCHOOLS

The following table describes the schools with no enrollment issues identified during the 2010-11 school year.

CLEAN SCHOOLS								
	District IRN	School District Name	School Name	County Name	Tested State Roll Up Students	AOS Sample Size for Tested State Roll Up Students	AOS Testing Phase	Results
1.	048793	Cardington-Lincoln Local	High School	Morrow	59	59	One	Clean
2.	043760	Circleville City	Nicholas Elementary School	Pickaway	20	20	One	Clean
3.	043794	Cleveland Heights- University Heights City	Bellefaire	Cuyahoga	48	48	One	Untested ¹⁶
4.	045344	Crestline Exempted Village	Crestline Southeast Elementary School	Crawford	23	23	One	Clean
5.	043844	Dayton City	Meadowdale PreK-8 School	Montgomery	50	50	One	Clean
6.	043950	Euclid City	Euclid High School	Cuyahoga	285	285	One	Clean
7.	048843	Franklin Local	Roseville Elementary School	Muskingum	18	18	One	Clean
8.	044040	Garfield Heights City	Garfield Heights Middle School	Cuyahoga	107	107	One	Clean
9.	046953	Hamilton Local	Hamilton Intermediate School	Franklin	107	107	One	Clean
10.	046953	Hamilton Local	Hamilton Middle School	Franklin	68	68	One	Clean
11.	048520	Meigs Local	High School	Meigs	81	81	One	Clean
12.	046672	Mississinawa Valley Local	Mississinawa Valley JR/SR High School	Darke	38	38	One	Clean
13.	044412	Mt Healthy City	Junior High School	Hamilton	84	84	One	Clean
14.	044446	Nelsonville-York City	Nelsonville-York High School	Athens	50	50	One	Clean
15.	044511	North College Hill City	North College Hill High School	Hamilton	66	66	One	Clean
16.	044628	Painesville City Local	Harvey High School	Lake	91	91	One	Clean
17.	046599	Richmond Heights Local	Richmond Heights Secondary School	Cuyahoga	43	43	One	Clean
18.	044818	Springfield City	Springfield High School	Clark	146	146	One	Clean
19.	049155	Western Local	Western High School	Pike	48	48	One	Clean
20.	045666	Windham Exempted Village	Windham Junior High School	Portage	21	21	One	Clean
21.	044081	Winton Woods City	Winton Woods Elementary School	Hamilton	66	66	One	Clean ¹⁷

¹⁶ This is a special-needs school with students from numerous districts represented. Based on the special circumstances related to this school and the expertise required to perform testing, it was not cost effective for AOS to conduct attendance testing for this school.

¹⁷ While the results of AOS testing for this school were clean, AOS identified student attendance withdrawal practices in other buildings within the district which resulted in AOS reporting the Winton Woods CSD district as a school district with evidence of scrubbing in Sections 10.3.9 and 12.1 of this report.

CLEAN SCHOOLS								
	District IRN	School District Name	School Name	County Name	Tested State Roll Up Students	AOS Sample Size for Tested State Roll Up Students	AOS Testing Phase	Results
22.	045120	Wooster City	Boys Village	Wayne	69	69	One	Clean
23.	043539	Barberton City	Highland Middle School	Summit	42	30	Two	Clean
24.	043539	Barberton City	Johnson Elementary School	Summit	33	33	Two	Clean
25.	043539	Barberton City	Memorial Elementary School	Summit	17	17	Two	Clean
26.	046300	Batavia Local	Batavia Elementary School	Clermont	43	30	Two	Clean
27.	046300	Batavia Local	Batavia Middle School	Clermont	67	30	Two	Clean
28.	047241	Beavercreek City	Shaw Elementary	Greene	43	30	Two	Clean
29.	043570	Bellaire Local	Bellaire Middle School	Belmont	47	30	Two	Clean
30.	049692	Bettsville Local	Bettsville High School	Seneca	4	4	Two	Clean
31.	049692	Bettsville Local	Bettsville Middle School	Seneca	5	5	Two	Clean
32.	043638	Bowling Green Local	Crim Elementary	Wood	29	29	Two	Clean
33.	043638	Bowling Green Local	Milton Elementary	Wood	8	8	Two	Clean
34.	043695	Cambridge City	High School	Guernsey	58	58	Two	Clean
35.	043695	Cambridge City	Middle School	Guernsey	31	31	Two	Clean
36.	048488	Cloverleaf Local	Cloverleaf Elementary School	Medina	32	32	Two	Clean
37.	049999	Coventry Local	Erwine Intermediate School	Summit	19	19	Two	Clean
38.	049189	Crestwood Local	Crestwood/Larham	Portage	10	10	Two	Clean
39.	047027	Dublin City	Albert Chapman Elementary School	Franklin	26	26	Two	Clean
40.	047027	Dublin City	Ann Simpson Davis Middle School	Franklin	93	30	Two	Clean
41.	047027	Dublin City	Dublin Scioto High School	Franklin	81	30	Two	Clean
42.	047027	Dublin City	Griffith Thomas Elementary School	Franklin	37	30	Two	Clean
43.	047027	Dublin City	Wyandot Elementary School	Franklin	43	30	Two	Clean
44.	047845	East Knox Local	East Knox Elementary School	Knox	17	17	Two	Clean
45.	047795	Edison Local	Edison High School	Jefferson	25	25	Two	Clean
46.	047795	Edison Local	Edison Junior High School	Jefferson	5	5	Two	Clean
47.	047795	Edison Local	John E. Gregg Elementary	Jefferson	7	7	Two	Clean
48.	047795	Edison Local	Pleasant Hills Elementary	Jefferson	5	5	Two	Clean
49.	047795	Edison Local	Stanton Elementary	Jefferson	18	18	Two	Clean
50.	043943	Elyria City	Franklin Elementary School	Lorain	30	30	Two	Clean
51.	049775	Fairlawn Local	Fairlawn High School	Shelby	31	31	Two	Clean
52.	044016	Fremont City	Washington Elementary School	Sandusky	12	12	Two	Clean

CLEAN SCHOOLS								
	District IRN	School District Name	School Name	County Name	Tested State Roll Up Students	AOS Sample Size for Tested State Roll Up Students	AOS Testing Phase	Results
53.	049619	Green Local	Green High School	Scioto	15	15	Two	Clean
54.	048751	Huber Heights City	Kitty Hawk Elementary	Montgomery	10	10	Two	Clean
55.	048751	Huber Heights City	Lamendola Elementary	Montgomery	33	30	Two	Clean
56.	047985	Johnstown-Monroe Local	Willis C Adams Middle School	Licking	9	9	Two	Clean
57.	048009	Licking Heights Local	Central	Licking	45	45	Two	Clean
58.	048009	Licking Heights Local	High School	Licking	74	74	Two	Clean
59.	044222	Lima City	Lima West Middle School	Allen	32	30	Two	Clean
60.	044297	Mansfield City	Mansfield Middle School	Richland	41	30	Two	Clean
61.	044297	Mansfield City	Newman Elementary School	Richland	7	7	Two	Clean
62.	044354	Massillon City	Emerson Elementary School	Stark	10	10	Two	Clean
63.	044388	Medina City	Evolve Academy	Medina	3	3	Two	Clean
64.	044420	Mount Vernon City	Dan Emmett Elementary	Knox	27	27	Two	Clean
65.	047365	Northwest Local	Northwest High School	Hamilton	64	30	Two	Clean
66.	047365	Northwest Local	Pleasant Run Middle School	Hamilton	64	30	Two	Clean
67.	047365	Northwest Local	Taylor Elementary	Hamilton	24	24	Two	Clean
68.	091397	Tri-County North Local	Tri-County North High School	Preble	14	14	Two	Clean
69.	045922	Trimble Local	Trimble Elementary School	Athens	14	14	Two	Clean
70.	045922	Trimble Local	Trimble High School	Athens	24	24	Two	Clean
71.	050070	Twinsburg City	Twinsburg High School	Summit	68	30	Two	Clean
72.	045054	West Carrollton City	C F Holliday Elementary School	Montgomery	38	30	Two	Clean
73.	045054	West Carrollton City	Frank Nicholas Elementary School	Montgomery	10	10	Two	Clean
74.	045054	West Carrollton City	Harry Russell Elementary School	Montgomery	31	30	Two	Clean
75.	046359	West Clermont Local	Withamsville-Tobasco Elementary	Clermont	25	25	Two	Clean
76.	049973	Woodridge Local	Woodridge Intermediate Elementary School	Summit	33	33	Two	Clean
77.	045138	Worthington City	Worthington Estates Elementary	Franklin	27	27	Two	Clean
78.	045153	Xenia Community School District	Simon Kenton Elementary	Greene	18	18	Two	Clean
79.	049544	Zane Trace Local	Zane Trace High School	Ross	24	24	Two	Clean
80.	043844	Dayton City	Longfellow Alternative School	Montgomery	91	30	Three	Clean
81.	043844	Dayton City	Dayton Boys Preparatory Academy	Montgomery	31	31	Three	Clean
82.	046953	Hamilton Local	Hamilton Township High School	Franklin	92	30	Three	Clean

12.4. ADDITIONAL 28 SCHOOL DISTRICTS

The following table describes the results of enrollment testing for the 2010-11 school year for the additional 28 school districts selected as part of Phase One.

PHASE ONE ADDITIONAL 28 SCHOOL DISTRICTS RESULTS							
	District IRN	School District Name	School Name	County Name	Tested State Roll Up Students	Issues Identified (See Results for additional information)	Results
1.	048124	Avon Lake City	All	Lorain	93	0	Clean
2.	045203	Barnesville Exempted Village	All	Belmont	51	0	Clean
3.	047167	Berkshire Local	All	Geauga	34	0	Clean
4.	046433	Crestview Local	All	Columbiana	15	0	Clean
5.	047837	Danville Local	All	Knox	21	0	Clean
6.	048413	Elgin Local	All	Marion	87	0	Clean
7.	047936	Fairland Local	All	Lawrence	52	0	Clean
8.	048843	Franklin Local	All	Muskingum	170	0	Clean
9.	046342	Goshen Local	All	Clermont	161	0	Clean
10.	045435	Indian Hill Exempted Village	All	Hamilton	27	0	Clean
11.	050369	Lincolnview Local	All	Van Wert	67	0	Clean
12.	045450	Lisbon Exempted Village	All	Columbiana	41	0	Clean
13.	044289	Madeira City	All	Hamilton	28	0	Clean
14.	050740	Mohawk Local	All	Wyandot	21	0	Clean
15.	044495	Niles City	All	Trumbull	152	0	Clean
16.	044503	North Canton City	All	Stark	106	3	3- Lack of support for the attendance event.
17.	049478	Ontario Local	All	Richland	47	0	Clean
18.	050054	Revere Local	All	Summit	64	0	Clean
19.	050500	Warren Local	All	Washington	107	0	Clean
20.	043554	Beachwood City	All	Cuyahoga	52	2	<p>2- During this period the District was on ESIS, now the district is on a new system and they were unable to pull the names of these students as they also withdrew before transition to the new system.</p> <p>We obtained clarification from ODE indicating that these students were properly excluded.</p>
21.	046714	Central Local	All	Defiance	33	3	<p>1 - Student was reported as withdrawn on 11/9/10 on F/Y 2011 WKC list. The student was enrolled at the district during the 2010-2011 school year; the student file included graduation testing scores and an official transcript from the district was dated 6/5/11. Student was miscoded with a "41" withdrawal date and not detected by district personnel.</p> <p>1 - Student was reported with an admission date of 4/20/11 on F/Y 2011 WKC list. The student was enrolled at the district during the 2010-2011 school year; IEP's are on file for the student and graduation testing scores were in the student file indicating the student had passed all graduation testing back on 3/1/09. Student was miscoded and not detected by district personnel.</p>

PHASE ONE ADDITIONAL 28 SCHOOL DISTRICTS RESULTS

	District IRN	School District Name	School Name	County Name	Tested State Roll Up Students	Issues Identified (See Results for additional information)	Results
							1 - Student was reported with an admission date of 3/1/11 on F/Y 2011 WKC list; however the student's actual enrollment date was 8/1/11. The student was enrolled at another local school district all of the 2010-2011 school year. Correspondence in the student's file requesting release of the student's records did not occur between districts until August 2011, which corresponds to the actual enrollment date and not the admission date reported on the F/Y 2011 WKC list. Student was miscoded and not detected by district personnel.
22.	047852	Fredericktown Local	All	Knox	50	2	1 – District was unable to find name associated with SSID #. Two different employees looked up the SSID# and were unable to find a student name. 1 – Student file lacked support for withdrawal date.
23.	050187	Lakeview Local	All	Trumbull	64	25	2 - Students had no files. 1 - Special Ed. Student attending Trumbull Career and Technical Center with home school of Girard. File contains minimal support other than official transcript and email. 20 - Viewed official transcript. No file maintained. 1 - Transcript documents student graduated in June 2008. 1 - File shows student has attended Lakeview Schools since 2006. Student File does not support WKC Description. Lakeview High School procedures have been to purge files after 1 year of withdrawal. Transcripts were maintained noting the withdrawal date.
24.	000442	Manchester Local	All	Adams	46	1	1 - Manchester LSD did not have documentation as to the withdrawal of this student and indicated the withdrawal code 41 used was improper - However, we were able to review the data file received from ODE noting this student also shows up on the file for West Clermont LSD with an enrollment date consistent with the noted withdrawal date from Manchester LSD. The student was coded as a 41 transfer to another Ohio School District; however, the file did not contain a withdrawal form or any request for records from another school district around the date noted on the report. Therefore, we asked the EMIS Secretary to look at the file and see if she could find the documentation. She responded that the student was withdrawn under

PHASE ONE ADDITIONAL 28 SCHOOL DISTRICTS RESULTS							
	District IRN	School District Name	School Name	County Name	Tested State Roll Up Students	Issues Identified (See Results for additional information)	Results
							code 41 by error as she was their student when she was placed elsewhere by court order. The EMIS Secretary indicated the code used should have been an "R" for a student placed elsewhere by court order. Although the coding may have been wrong for this student, the student was properly rolled up to the State under the noted circumstances.
25.	050724	Otsego Local	All	Wood	58	3	<p>1 - A student was coded as a "41" which was transfer to another district, transcript request on file. Student was over 18 when left, and did not provide a new district going to attend, so should have been coded "73". The "73" was a valid code for rolling the student to the State and not including in District count.</p> <p>2 - A family withdrew their 2 children on 4/25 and went to another District in another City. The family did not re-enroll the children till the start of the following school year. The student files could not be located due to misplaced during a new school project. Their school was torn down and files moved to the new location.</p> <p>Additionally, 2 withdrawals of students did not include withdrawal forms within the student files. However, the file did include records requests from the other districts to support the transfer of the student to the other district.</p>
26.	045781	Perry Local	All	Allen	42	3	<p>3 - Lack of support for the attendance event.</p> <p>Also noted 14 instances whereby enrollment/withdraw form not included in file; however, other documentation/information available in student file/from district to support attendance event.</p>
27.	047969	Symmes Valley Local	All	Lawrence	38	1	1 - Student was improperly coded due to the fact that the student was withdrawn by mistake then re-enrolled the same day. However, this created an inaccurate break in attendance that was not corrected by the District, causing the student to be rolled up to the State.
28.	049437	Lexington Local	All	Richland	103	1	1 - The District was unable to locate the file of 1 student. We were able to review the data file received from ODE noting this student also shows up on the file for Highland Local Schools with an enrollment date consistent with the noted withdrawal date from Lexington LSD. The coding/withdrawal appears to be accurate.

12.5. PHASE THREE COMMUNITY SCHOOLS

The following table describes the results identified during the 2010-11 school year for Phase Three community schools selected for testing. To select these community schools, AOS obtained and analyzed a list of community schools in Academic Watch or Academic Emergency during the 2009-10 and 2010-11 school years. From this list, AOS randomly selected five schools for testing.

During AOS' review of London Academy, London Academy officials informed AOS that occasionally a student is unable to pass the OGT tests. When this occurs, London Academy crafts correspondence courses for the student to obtain a diploma, using the American School Curriculum. When the student otherwise meets graduation criteria (i.e., number of credits, etc.) but has trouble passing the OGTs, the student is withdrawn from London Academy and enrolled in the State of Illinois, which does not have the same graduation tests used by Ohio. If the student is able to pass the correspondence courses provided by American School Curriculum, the student is awarded a diploma from the State of Illinois.

Through inquiry with ODE, ODE informed AOS that ODE is actively working with London Academy regarding other matters to ensure compliance with State laws. This additional matter involving students transferring to the State of Illinois to receive diplomas was also referred to ODE by AOS.

PHASE THREE COMMUNITY SCHOOLS							
	District IRN	School District Name	School Name	County Name	Tested State Roll Up Students	Issues Identified (See Results for additional information)	Results
1.	151191	Life Skills Center of Summit County	Life Skills Center of Summit County	Summit	30	0	Note: 10 students were coded as 71 withdrawals. Each of these students was over the age of 18 and technically fell under code 73 classifications. However, through inquiry with ODE, these students had to be coded as 71 based on current guidelines of the 105 hour rule and corresponding funding requirements. See recommendation within the body of this report.
2.	009154	Cincinnati Leadership Academy	Cincinnati Leadership Academy	Hamilton	7	0	Clean
3.	007995	Cleveland Arts and Social Sciences Academy	Cleveland Arts and Social Sciences Academy	Cuyahoga	26	0	Clean
4.	151027	London Academy	London Academy	Madison	30	0	Note: As noted above, AOS referred to ODE a matter involving students who are unable to pass the OGTs transferring to the State of Illinois to receive diplomas.
5.	143545	Toledo Preparatory Academy	Toledo Preparatory Academy	Lucas	22	10	<p>4 – Students coded as code 41 withdrawal (Withdrawn to another Ohio school district) for which student files could not be located.</p> <p>2 – Student coded as code 41 withdrawal for which the district to which the student transferred was not noted and no additional evidence was noted confirming student enrolled in the other district.</p> <p>4 – Students for which a mid-year enrollment was noted but no supporting documentation was available to provide evidence of the mid-year enrollment.</p>

12.6. PHASE THREE OTHER SCHOOLS

The following table describes the results identified during the 2010-11 school year for other Phase Three schools selected for testing. These schools were not initially selected as part of the Phase Three sample; however, were examined during Phase Three as a result of other information coming to the attention of AOS.

PHASE THREE OTHER SCHOOLS							
	District IRN	School District Name	School Name	County Name	Tested State Roll Up Students	Issues Identified (See Results for additional information)	Results
1.	133413	Electronic Classroom of Tomorrow	Electronic Classroom of Tomorrow	Franklin	30	0	Clean
2.	044248	Logan-Hocking Local School District	Logan High School; Logan-Hocking Middle School; Central Elementary; Green Elementary School; Hocking-Hills Elementary School; Union Furnace Elementary School	Hocking	30	5	<p>1 - The student was withdrawn on 3/3/11 and re-enrolled in the District on 3/10/11. Per inquiry of the Director of Student Services, the withdrawal on 3/10/11 was a mistake, as the student was still a resident and responsibility of the District.</p> <p>1 – Insufficient documentation to support the enrollment.</p> <p>2 – The student was withdrawn and re-enrolled a few days later with no documentation to support the withdrawal or reenrollment.</p> <p>1 – The student was listed as being enrolled on 4/21/11; however there was no enrollment form on file. In addition, the student was withdrawn on the 4/15/11, but the Registrar stated that the student’s noncustodial parent attempted to enroll the child at another school district, but the student did not have a break in attendance and should not have been withdrawn.</p> <p>Note: An inquiry with the EMIS Coordinator revealed that it is a practice at some of the Schools to remove and destroy some of the enrollment forms after the student graduates before the file is stored.</p>
3.	047712	Monroeville Local School District	Monroeville High School, Monroeville Elementary School	Huron	20	0	Clean

PHASE THREE OTHER SCHOOLS							
	District IRN	School District Name	School Name	County Name	Tested State Roll Up Students	Issues Identified (See Results for additional information)	Results
4.	045112	Wilmington City School District	Denver Place Elementary School, East End Elementary School, Rodger O. Borror Middle School, Roy E. Holmes Elementary School, Wilmington High School	Clinton	138	1	1-Student for which the District did not have sufficient supporting documentation to support the attendance event noted.
5.	061903	Adams County/Ohio Valley Local	West Union High School, Peebles High School, West Union Elementary School, North Adams Elementary School, Peebles Elementary School	Adams	30	4	4-Students for whom the wrong withdrawal code was used by the District. One student was coded as withdrawal code 40 (Transferred to another school district outside of Ohio) but documentation supported that the student transferred to another Ohio school district. Therefore, the student should have been coded as a code 41 withdrawal (Transferred to another Ohio school district). Three additional students were separately coded as code 43 (Transferred to home schooling), code 48 (Expelled), and code 72 (Pursued employment/work permit). However, there was no evidence available to support these withdrawal codes for these students. Through additional review and inquiry, AOS noted each of these students was over the age of 18 at the time of withdrawal and should have been withdrawn using withdrawal code 73 (Over 18 years of age).
6.	044669	Portsmouth City	Portsmouth West High School, Portsmouth West Middle School, Portsmouth Junior High School/Portsmouth High School, Portsmouth West High School, Portsmouth Elementary, Portsmouth West Elementary, East Portsmouth Elementary	Scioto	30	3	3 – Students were withdrawn due to expulsion for less than then days; these expulsions should have been suspensions.
7.	050195	Liberty Local	Liberty High School, William S Guy Middle School, EJ Blott Elementary School	Trumbull	30	0	Clean

PHASE THREE OTHER SCHOOLS							
	District IRN	School District Name	School Name	County Name	Tested State Roll Up Students	Issues Identified (See Results for additional information)	Results
8.	044529	North Olmstead City	North Olmsted Middle School, Maple Intermediate Elementary School, North Olmsted Middle School, Pine School, Birch Elementary School, North Olmsted High School	Cuyahoga	30	0	Clean
9.	045914	Federal Hocking Local	Federal-Hocking High School, Federal-Hocking Middle School, Amesville Elementary School, Coolville Elementary School	Athens	30	8	<p>1 – Insufficient documentation to support the enrollment.</p> <p>2 – Insufficient documentation to support the withdrawal date.</p> <p>1 – Student was withdrawn on 8/19/10 with a WKC code of 41 (transferring to another Ohio school district). However, no withdrawal form was on file and the records request from another school district was not sent until 2/9/11.</p> <p>3 – Student was withdrawn under WKC code 40 (transferring to another school district outside of Ohio), however these students were attending the JVS.</p>
10.	044024	Galion City	Galion High School, Galion Middle School, Galion Intermediate Elementary School	Crawford	30	0	Clean

13. SCHOOL DISTRICT EXCLUSION LIST

The following table lists school districts AOS excluded from testing based on the relatively low percentage of tested students rolled up to the State report card for the 2010-11 school year in comparison to other schools. Unlike the earlier sections of this report, this table includes both levy and non-levy school districts. AOS identified certain school districts for which all schools within the district were reasonably close to the mean number of tested students rolled up to the State report card for all schools. Based on this analysis, AOS determined those districts with all schools in the bottom 25% of the “tested students rolled up to the State percentage” category. There were 26 school districts that met these criteria and will be excluded from the scope of AOS student attendance testing due to the remote likelihood of significant errors in the number of tested students rolled up to the State report card. See Section 9 of this report for more information about the AOS exclusion criteria. School districts with levies on the November 2012 ballot are denoted with an asterisk (*) in the table.

SCHOOL DISTRICT EXCLUSION LIST									
	District IRN	School District Name	County Name	State Roll Up Students ¹¹	Percent of State Roll Up Students ¹²	Tested State Roll Up Students ¹³	Percent of Tested State Roll Up Students ¹⁴	Total Students ¹⁵	Asterisk (*) Indicates Levy
1.	045286	Chagrin Falls Exempted Village	Cuyahoga	59	2.8%	20	1.0%	2,074	
2.	045310	Coldwater Exempted Village	Mercer	98	6.4%	12	0.8%	1,523	
3.	064964	College Corner Local	Preble	39	29.5%	0	0.0%	132	
4.	046557	Cuyahoga Heights	Cuyahoga	27	2.8%	14	1.4%	975	
5.	047050	Evergreen Local	Fulton	86	6.0%	9	0.6%	1,422	
6.	049783	Fort Loramie Local	Shelby	67	7.5%	4	0.4%	899	
7.	048595	Fort Recovery Local	Mercer	53	4.7%	2	0.2%	1,132	
8.	046565	Independence Local	Cuyahoga	51	4.4%	15	1.3%	1,161	
9.	045435	Indian Hill Exempted Village	Hamilton	93	4.3%	27	1.2%	2,174	
10.	049338	Jennings Local	Putnam	63	14.2%	5	1.1%	443	
11.	047191	Kenston Local	Geauga	114	3.4%	42	1.3%	3,331	
12.	047878	Kirtland Local	Lake	46	3.7%	7	0.6%	1,248	*

SCHOOL DISTRICT EXCLUSION LIST									
	District IRN	School District Name	County Name	State Roll Up Students ¹¹	Percent of State Roll Up Students ¹²	Tested State Roll Up Students ¹³	Percent of Tested State Roll Up Students ¹⁴	Total Students ¹⁵	Asterisk (*) Indicates Levy
13.	047449	Liberty-Benton Local	Hancock	191	13.3%	18	1.3%	1,433	
14.	048330	Lowellville Local	Mahoning	27	4.3%	11	1.7%	634	
15.	048553	Marion Local	Mercer	40	4.3%	9	1.0%	932	
16.	049361	Miller City-New Cleveland Local	Putnam	41	8.4%	5	1.0%	487	
17.	045948	Minster Local	Auglaize	50	5.5%	4	0.4%	905	
18.	045955	New Bremen Local	Auglaize	61	6.6%	13	1.4%	918	
19.	045963	New Knoxville Local	Auglaize	42	8.7%	5	1.0%	483	
20.	044586	Oakwood City	Montgomery	83	3.7%	22	1.0%	2,250	
21.	046763	Olentangy Local	Delaware	363	2.2%	96	0.6%	16,734	
22.	048215	Ottawa Hills Local	Lucas	44	4.3%	16	1.6%	1,028	*
23.	049387	Ottoville Local	Putnam	42	8.0%	6	1.1%	522	
24.	048975	Put-In-Bay Local	Ottawa	2	2.5%	0	0.0%	81	
25.	048363	South Range Local	Mahoning	50	3.7%	18	1.3%	1,343	*
26.	048587	St Henry Consolidated Local	Mercer	54	5.3%	9	0.9%	1,022	

14. VIEWS OF RESPONSIBLE SCHOOL OFFICIALS

The schools identified in Section **12.1** with evidence of scrubbing were provided an opportunity to respond to this report. Their responses were evaluated and changes were made to this report as AOS deemed necessary.

District responses can be obtained by contacting the school districts listed in section **12** of this report.

15. APPENDIX

ODE sent the following July 25, 2012, letter to Lockland School District upon finding that Lockland had “falsely reported” school attendance data. As described in this letter, ODE revised downward the school district’s report card rating.

John R. Kasich, Governor
Stan W. Heffner, Superintendent of Public Instruction

VIA EMAIL AND CERTIFIED MAIL

July 25, 2012

Donna F. Hubbard, Superintendent
Lockland School District
210 N. Cooper Avenue
Cincinnati, OH 45215-3011

Dear Superintendent Hubbard:

This letter is to inform you that the Ohio Department of Education (ODE) has completed its investigation into the allegation that the Lockland School District (Lockland) had improperly reported its Education Management Information System (EMIS) data during the 2010-2011 school year. In summation, as a result of our investigation, and as further detailed in this letter, ODE has determined that:

- Lockland failed to meet the burden of proof required to demonstrate that it made a good faith effort to properly report data to ODE as required by law.
- Lockland personnel improperly and falsely reported that thirty-seven students were withdrawn during the 2010-2011 school year to attend another Ohio school district.
- Lockland subsequently reenrolled thirty-seven withdrawn students into the district despite the fact that EMIS data illustrates that the students did not leave to attend another Ohio school district as falsely reported.
- Lockland's falsification of attendance data wrongfully benefitted the 2010-2011 district and school building report cards, thus requiring ODE to exercise its statutory authority to recalculate and reissue corrected 2010-2011 district and school building report cards to lower ratings in numerous areas of Ohio's accountability system.
- Findings of this investigation will be provided to the Office of Professional Conduct at ODE for formal review to determine if further investigation and action is warranted to ascertain if you or any ODE licensed professionals in Lockland participated in conduct unbecoming the teaching profession to falsely improve 2010-2011 district and/or school building local report card ratings.
- Lockland and Lockland personnel shall immediately report any/all EMIS data honestly and correctly in accordance with all required policies, procedures, regulations, and laws.

As you will recall, on March 27, 2012, after an initial review of your district data, ODE requested in writing any information in your possession to support the coding of thirty-eight Lockland students as withdrawn. On May 2, 2012, ODE received Lockland's response drafted by legal counsel, David J. Lampe. Mr. Lampe stated in his letter that, "documentation of efforts made by the District to obtain executed withdrawal forms, receipt of requests for records from receiving School districts, and other documents supporting a designation as withdrawn are lacking."

Pursuant to Ohio Revised Code 3301.0714(L), ODE has the authority to investigate and take certain actions with regard to the submission of inaccurate EMIS data. RC 3301.0714(L)(9) indicates that, "the burden of proof shall be on the district to demonstrate that it made a good faith effort to report data as required by this section." ODE has dutifully provided your district the opportunity to support, with any documentation in its possession, the decisions to report the students in question as withdrawn in EMIS. Lockland has not provided required documentation to support the withdrawal reason, "transferred to another Ohio school district," reported for thirty-seven of the thirty-eight students in question. As a result, ODE concludes that Lockland has failed in its burden to show it made a good faith effort to report accurate attendance data for thirty-seven students during the 2010-2011 school year.

Again, ODE's data review has determined that Lockland failed to provide any documentation to support the withdrawal of thirty-seven of the students in question. In fact, based upon a review of EMIS data, ODE has confirmed that thirty-seven of the thirty-eight students withdrawn from your district were not reported in EMIS as having enrolled in another school district during the period of being withdrawn from Lockland. Furthermore, these thirty-seven students were later reenrolled in Lockland after their break in attendance. Thus, EMIS data clearly demonstrates that these thirty-seven students were educated exclusively by Lockland and improperly withdrawn during the 2010-2011 school year by Lockland personnel. This falsification is further evidenced by inconsistencies in daily attendance records and alleged periods of student withdrawals entered by Lockland personnel.

Lockland's failure to provide accurate data requires ODE to conclude that EMIS data for thirty-seven students in question was falsely reported. This falsification resulted in inflated accountability ratings for Lockland. By falsely withdrawing these students via EMIS data submitted, the limited and basic assessment scores for these students were not counted in their respective school or your district accountability calculations for the 2010-2011 school year report cards.

Because Lockland benefitted wrongly from the inaccurate withdrawal data entered into EMIS, in accordance with RC 3301.0714(L)(2)(d)(viii), ODE is exercising its power to revise the 2010-2011 Lockland Report Cards. The 2010-2011 report cards bearing the water mark referencing this investigatory review will be removed and ODE will reissue corrected 2010-2011 Lockland District and Building Report Cards.

The revised report cards now illustrate the inclusion of assessment data for thirty-six of the remaining thirty-seven students in question by ODE. Two of the original thirty-eight students in question were excluded from the data recalculation. As previously accounted,

one student in question was properly justified and documented for withdrawal status. A second student, although not properly documented for withdrawal, was a first year Limited English Proficient student who would have been excluded from the accountability calculation despite the inappropriate break in enrollment. Overall, the proper inclusion of the accountability data for the thirty-six students will result in the following changes for Lockland as illustrated in the attached corrected report cards for the 2010-2011 school year:

LEA Name	Number of Students Added to Results	Old Rating	New Rating	Old State Indicators Met	New State Indicators Met	Old PI	New PI	Old AYP	New AYP	Old Improvement Status	New Improvement Status
Lockland Local	36										
	10 in 3 rd 8 in 4 th 4 in 5 th 1 in 7 th 3 in 8 th 4 in 10 th 6 in 11 th	Effective	Continuous Improvement	20 of 26	14 of 26	93.3	88.1	Met	Not Met	Ok	At Risk
Arlington Heights Academy	4	Not Rated									
	2 in 10 th 2 in 11 th	(due to insufficient number of students)	Continuous Improvement	1 of 2	1 of 7	89.3	79.3	Met	Met	Ok	Ok
Lockland Elementary	22										
	10 in 3 rd 8 in 4 th 4 in 5 th	Continuous Improvement	Academic Watch	3 of 8	1 of 8	85.6	77.7	Met	Not Met	OK	At Risk
Lockland Middle	4										
	1 in 7 th 3 in 8 th	Effective	Effective	7 of 8	6 of 8	94.2	92	Met	Met	Ok	Ok
Lockland High	6										
	2 in 10 th 4 in 11 th	Excellent	Excellent	12 of 12	11 of 12	103.2	100.4	Met	Met	Ok	Ok

Based upon the actions outlined herein, ODE's investigation of EMIS data related to thirty-eight students during the 2010-2011 school year is now concluded. However, pursuant to RC 3301.0714(L)(2)(d)(vi) & (N), findings of this investigation will be provided to the Office of Professional Conduct at ODE for review to determine if further investigation is warranted to ascertain if you or any ODE licensed professionals in Lockland participated in conduct unbecoming the teaching profession to contribute to the falsified reporting of attendance data to improve 2010-2011 district and school ratings. As I have communicated to you previously, these actions are serious in nature, will not be tolerated, and may result in professional conduct sanctions against any/all culpable Lockland personnel, up to and including suspension or revocation of licensure, and/or other personnel actions as determined by the Lockland Board of Education.

It is my expectation that Lockland will continue to cooperate fully if further action is determined necessary by the Office of Professional Conduct. Additionally, Lockland will immediately report any/all EMIS data honestly, accurately, and in accordance with all reporting policies, procedures, regulations, and laws.

Sincerely,

Stan Hoff

C:

Certified mail numbers: 7011 1150 0000 5865 1946 Donna Hubbard
7011 1150 0000 5865 2141 Terry Gibson



Dave Yost • Auditor of State

STATEWIDE AUDIT OF STUDENT ATTENDANCE DATA AND ACCOUNTABILITY SYSTEM

CLERK'S CERTIFICATION

This is a true and correct copy of the report which is required to be filed in the Office of the Auditor of State pursuant to Section 117.26, Revised Code, and which is filed in Columbus, Ohio.

Susan Babbitt

CLERK OF THE BUREAU

CERTIFIED
FEBRUARY 11, 2013